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10/2/2025 3:35 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO RECUSE ACTING JUDGE KEITH STEWART

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing *pro se*, and respectfully files this *Motion to Recuse Acting Judge Keith Stewart*. In support thereof, the Defendant would show the Court the following:

I. BACKGROUND AND PROCEDURAL HISTORY

1. **The Defendant was arrested on August 7, 2019.**
2. **On August 9, 2019, an application for court-appointed counsel was submitted, signed, and notarized by Berenice Greathouse, verifying the Defendant's indigent and unemployed status.**
3. **At the initial court date, the Defendant's court-appointed attorney, Darin John Ray[24003718], failed to appear. Instead, an unidentified woman appeared with a pre-signed scheduling order, which the Defendant was pressured to sign without confirmation that Attorney Ray had authorized it. The presiding Judge, Keith Stewart, allowed this to proceed.**

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Exhibit:_____

4. **On September 30, 2019, the Defendant appeared in court and met Darin J. Ray for the first time since arrest. The Defendant specifically requested a new attorney as co-counsel, a request not properly addressed or explained by the court.**
5. **Subsequently, David Bluestein[02510700] was appointed attorney, as reflected in an "Order of Attorney Appointment" dated September 30, 2019, confirming the Defendant's presence in court on that date.**
6. **The Defendant filed three affidavits and a counterclaim on September 30, 2019. These were accepted into the court record.**
7. **Despite this, an "Order for Issuance of Capias" was entered on October 7, 2019, falsely stating that the Defendant failed to appear when called in court on September 30, 2019, and ordering forfeiture of the Defendant's bond and issuance of a $10,000 warrant.**
8. **The bailiff certificate supporting the forfeiture contradicts the court order, claiming the Defendant was called outside the courtroom and failed to appear despite reasonable time.**
9. **The Defendant has verified with the Court Reporter and Court Administrator that the Defendant was physically present in court on September 30, 2019, but transcripts confirming this have not been filed.**
10. **These procedural irregularities and misrepresentations have caused ongoing prejudice and harm to the Defendant, including wrongful bond forfeiture, issuance of an invalid warrant, loss of driver's license, and inability to work for over five years.**
11. **On May 8, 2020, at 3:56 PM, a document titled "Motion to Withdraw as Attorney of Record" was filed into the official court record by David Bluestein[02510700], the attorney previously appointed to the Defendant.**
12. **In Section 1 of that motion, Mr. Bluestein falsely claimed: "David Bluestein was court-appointed to the Defendant in the above-referenced misdemeanor cause. The Defendant failed to appear on September 30, 2019, and has not been rearrested."**

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13. This statement is materially false. The Defendant did appear in court on September 30, 2019, as proven by the following:

a. The Defendant personally submitted three affidavits and a counterclaim to the court clerk, which were accepted into the record around 11:19 AM on that day.

b. The "Order of Attorney Appointment" naming David Bluestein[02510700] was generated by Berenice Greathouse at 10:51 AM on the same day, clearly demonstrating the Defendant was present.

c. Following the end of court on September 30, 2019, the Defendant met David Bluestein[02510700] in person in the court corridor and spoke with him briefly. This meeting occurred after the court session had concluded, and the Defendant was among the last to leave the courtroom after court adjourned., aside from court personnel and law enforcement staff.

14. Despite this interaction, Mr. Bluestein claimed in an official filing that the Defendant never appeared and has not been rearrested — a demonstrably false assertion contradicted by court records and witness confirmation.

15. The Defendant requested return of the original affidavits submitted to the court on September 30, 2019, but they were never returned. Their current whereabouts are unknown, and court personnel have refused to respond to inquiries.

16. In Section 2 of Bluestein's withdrawal motion, he stated: "Court-appointed counsel David Bluestein[02510700] is changing employment, with an anticipated start date of May 18, 2020."

17. Based on these filings:

a. Mr. Bluestein was appointed on September 30, 2019.

b. A capias (warrant) was issued against the Defendant on October 7, 2019, based on false claims of non-appearance.

c. During his approximately 8-month appointment, Mr. Bluestein made no effort to communicate with or assist the Defendant.

d. He submitted no motions, no evidence, and no filings on behalf of the Defendant, other than his initial appointment and his withdrawal.

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e. The Defendant only became aware of the $10,000 warrant by accident, months later, while attempting to seek resolution over the phone.

18. Judge Keith Stewart allowed these knowingly false and unverified statements — including those by Mr. Bluestein — to remain in the official court record and take legal effect, resulting in forfeiture of bond and escalation to a felony-grade warrant.

19. These acts — and the court's endorsement of them — amount to a pattern of judicial misconduct and bias against the Defendant. These facts justify recusal under Texas Rule of Civil Procedure 18b(2)(a), which provides that a judge must recuse himself in any proceeding in which 'the judge's impartiality might reasonably be questioned.' This constitutes a continuing violation of the Defendant's right to due process and fair access to justice.

20. The Defendant never received proper or timely communication regarding Attorney David Bluestein's withdrawal as counsel on or around May 6, 2020. During the entire approximate seven-month period of Mr. Bluestein's appointment, he failed to make any effort to contact, communicate with, or otherwise engage with the Defendant regarding the status of the case or his legal representation. This complete absence of communication constitutes a fundamental breach of the Defendant's right to effective assistance of counsel and due process, resulting in substantial prejudice to the Defendant's ability to prepare and defend against the charges.

21. The Defendant was never notified of Attorney David Bluestein's intent to withdraw, nor was any consent given or communication received regarding his removal as court-appointed counsel. Although Attorney Bluestein included a Certificate of Service with his Motion to Withdraw filed on May 8, 2020, this document failed to reflect any actual or attempted service upon the Defendant. No copy was ever provided to the Defendant, no signature or acknowledgment of receipt was obtained, and no verifiable record of delivery was filed in court. The motion was submitted and accepted without the Defendant's knowledge or opportunity to respond.

22. Despite these deficiencies, the Court permitted Attorney Bluestein to formally withdraw without requiring verification of service or any proof that the Defendant had been informed of

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the withdrawal or advised to obtain alternative representation. The Defendant was not made aware of the withdrawal and only discovered it through personal review of court records. During his time as appointed counsel, Mr. Bluestein filed no motions, submitted no evidence, and took no action to protect the Defendant's legal interests, apart from the initial appointment and the withdrawal itself.

23. The Court failed to appoint a replacement attorney, failed to notify the Defendant of the withdrawal, and failed to take any action to safeguard the Defendant's Sixth Amendment rights. The absence of any judicial inquiry or oversight into these failures constitutes a clear and continuing violation of the Defendant's constitutional right to notice, assistance of counsel, and due process under both state and federal law. This judicial inaction materially prejudiced the Defendant and further undermines the integrity of these proceedings.

II. GROUNDS FOR RECUSAL

24. The Defendant asserts that Judge Keith Stewart's conduct raises serious questions of impartiality and fairness due to:

- **a. Allowing unauthorized legal representation and coercion with a pre-signed contract.**
- **b. Accepting and entering false factual findings regarding the Defendant's presence in court.**
- **c. Ignoring documented evidence and affidavits proving the Defendant's compliance.**
- **d. Permitting issuance of a bond forfeiture and warrant based on fabricated claims.**
- **e. Failing to ensure Defendant's right to effective counsel and proper notice of attorney withdrawal.**
- **f. Overseeing procedural actions that have caused ongoing, substantial prejudice and constitutional violations.**

25. These actions violate the Defendant's constitutional right to due process and a fair trial and compromise the integrity of the judicial proceedings.

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III. CONCLUSION AND PRAYER

26. The facts presented above show a pattern of administrative negligence, attorney misconduct, and judicial endorsement of false statements and fabricated procedures. The continued participation of Judge Keith Stewart, under these circumstances, represents a conflict of interest, violates principles of impartial adjudication, and severely impairs the integrity of these proceedings.

27. WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court:

a. Grant this Motion to Recuse Judge Keith Stewart;

b. Assign a different, impartial judge to preside over this case;

c. Conduct a hearing or investigation into the procedural improprieties detailed herein;

d. Issue any legal action, sanction, or relief deemed proper under Texas law in light of the facts stated; and

e. Grant any other relief, legal or equitable, to which the Defendant may be justly entitled.

Executed on this 1st day of October, 2025.

/s/ [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR DISCOVERY OF COMPLETE CASE MATERIALS* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Automated Certificate of eService

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Envelope ID: 106385870
Filing Code Description: Motion
Filing Description: Motion to Recuse Acting Judge Keith Stewart
Status as of 10/2/2025 4:01 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 3:35:56 PM	SENT
[redacted]		[redacted]	10/2/2025 3:35:56 PM	SENT

Received and E-Filed for Record
10/2/2025 3:40 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
By: [redacted]32
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS [redacted]

VS. [redacted]

[redacted]

MOTION TO QUASH WARRANT AND RESTORE BOND

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and respectfully moves this Court to quash the outstanding warrant issued on or about October 7, 2019, for alleged failure to appear and to restore or refund the previously posted bond. In support of this Motion, the Defendant states as follows:

1. **The Defendant was present in court on September 30, 2019, as confirmed by multiple facts including the following:**

   a. Defendant filed and submitted three affidavits and a counterclaim to the court clerk on that date, which were accepted into the official record.

   b. The "Order of Attorney Appointment" for Attorney David Bluestein was signed and entered on the morning of September 30, 2019, specifically indicating that the Defendant was present.

   c. Defendant personally met with Attorney David Bluestein immediately following the court session in the courthouse corridor.

2. **Despite the Defendant's physical presence in court on September 30, 2019, an "Order for Issuance of Capias" was issued on October 7, 2019, falsely asserting that the Defendant failed**

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Exhibit:_____

to appear and ordering forfeiture of the $750 bond along with issuance of a $10,000 capias warrant.

3. **The bailiff's certificate supporting the capias is inconsistent with court records and improperly claims the Defendant failed to appear when called, despite the Defendant being inside the courtroom during docket call and seen by court personnel.**
4. **The Defendant has confirmed with the court reporter, Sally Hepburn, that the official transcripts from September 30, 2019, include clear evidence of the Defendant's presence. Ms. Hepburn has acknowledged this via email but has refused to file the transcript unless the Defendant purchases a copy for $100.**
5. **The issuance of a capias warrant and bond forfeiture under false pretenses constitutes a miscarriage of justice and violates the Defendant's right to due process under the U.S. Constitution and the Texas Constitution.**
6. **No notice or opportunity to contest the forfeiture or address the warrant was ever provided to the Defendant, nor was the Defendant re-arrested or given an explanation for the judicial action taken in his absence.**

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court:

a. Quash the October 7, 2019 warrant;

b. Vacate the bond forfeiture and order the immediate restoration or refund of the $750 bond previously posted, and award compensatory damages in the amount of $25,000 for the significant loss of time, income, and impairment of the Defendant's ability to work and drive resulting from the wrongful issuance of the warrant and related actions;

c. Correct the court record to reflect the Defendant's appearance on September 30, 2019;

d. Grant any further relief that this Court deems just and proper.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO QUASH WARRANT AND RESTORE BOND* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106386345
Filing Code Description: Motion
Filing Description: Motion to Quash Warrant and Restore Bond
Status as of 10/2/2025 4:01 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 3:40:24 PM	SENT
[redacted]		[redacted]	10/2/2025 3:40:24 PM	SENT

Received and E-Filed for Record
10/2/2025 3:54 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
By: [redacted]32
Deputy Clerk, Shari Klein

CAUSE NO. `32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO QUASH WARRANT AND RESTORE BOND

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and respectfully moves this Court to quash the outstanding warrant issued on or about October 7, 2019, for alleged failure to appear and to restore or refund the previously posted bond. In support of this Motion, the Defendant states as follows:

1. **The Defendant was present in court on September 30, 2019, as confirmed by multiple facts including the following:**

   a. Defendant filed and submitted three affidavits and a counterclaim to the court clerk on that date, which were accepted into the official record.

   b. The "Order of Attorney Appointment" for Attorney David Bluestein was signed and entered on the morning of September 30, 2019, specifically indicating that the Defendant was present.

   c. Defendant personally met with Attorney David Bluestein immediately following the court session in the courthouse corridor.

2. **Despite the Defendant's physical presence in court on September 30, 2019, an "Order for Issuance of Capias" was issued on October 7, 2019, falsely asserting that the Defendant failed**

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to appear and ordering forfeiture of the $750 bond along with issuance of a $10,000 capias warrant.

3. **The bailiff's certificate supporting the capias is inconsistent with court records and improperly claims the Defendant failed to appear when called, despite the Defendant being inside the courtroom during docket call and seen by court personnel.**
4. **The Defendant has confirmed with the court reporter, Sally Hepburn, that the official transcripts from September 30, 2019, include clear evidence of the Defendant's presence. Ms. Hepburn has acknowledged this via email but has refused to file the transcript unless the Defendant purchases a copy for $100.**
5. **The issuance of a capias warrant and bond forfeiture under false pretenses constitutes a miscarriage of justice and violates the Defendant's right to due process under the U.S. Constitution and the Texas Constitution.**
6. **No notice or opportunity to contest the forfeiture or address the warrant was ever provided to the Defendant, nor was the Defendant re-arrested or given an explanation for the judicial action taken in his absence.**

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court:

a. Quash the October 7, 2019 warrant;

b. Vacate the bond forfeiture and order the immediate restoration or refund of the $750 bond previously posted, and award compensatory damages in the amount of $25,000 for the significant loss of time, income, and impairment of the Defendant's ability to work and drive resulting from the wrongful issuance of the warrant and related actions;

c. Correct the court record to reflect the Defendant's appearance on September 30, 2019;

d. Grant any further relief that this Court deems just and proper.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO QUASH WARRANT AND RESTORE BOND* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106387742
Filing Code Description: Motion
Filing Description: Motion to Quash Warrant and Restore Bond
Status as of 10/2/2025 4:02 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 3:54:09 PM	SENT
[redacted]		[redacted]	10/2/2025 3:54:09 PM	SENT

Received and E-Filed for Record
10/2/2025 3:59 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
:32
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO VERIFY RECOGNITION AND PROTECTION OF CONSTITUTIONAL RIGHTS

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, John Jason Doe, Jr., appearing pro se, and moves this Court to formally verify whether it recognizes, upholds, and intends to protect the Defendant's guaranteed constitutional rights throughout the entirety of these proceedings, and in support states as follows:

1. **The Defendant is entitled to the full protection of the Constitution of the United States and the Texas Constitution, including but not limited to:**
    - **The right to due process under the Fifth and Fourteenth Amendments;**
    - **The right to equal protection under the law;**
    - **The right to effective assistance of counsel under the Sixth Amendment;**
    - **The right to be presumed innocent until proven guilty;**
    - **The right to confront witnesses and present a defense;**
    - **The right to be free from cruel and unusual punishment under the Eighth Amendment;**
    - **The right to remain silent and not be compelled to incriminate oneself;**
    - **The right to a fair, impartial, and public trial by jury.**

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2. **The Defendant seeks confirmation on the record that this Court acknowledges and affirms these rights as binding and enforceable throughout all proceedings and will ensure these protections are not waived, ignored, or denied.**

3. **The Defendant further requests that if this Court does not recognize the enforceability of any of the above-listed rights, it state specifically:**
   a. Which rights are not recognized or enforceable;
   b. The legal authority or statutory rule used as the basis for such non-recognition;
   c. The constitutional or legal doctrine being applied in substitution, if any.

4. **The Defendant submits that failure to affirmatively recognize and protect these constitutional rights constitutes a due process violation and may render any further proceedings invalid, void, or subject to challenge under applicable state and federal law.**

5. **The Defendant further requests a formal written order or acknowledgment from the Court addressing this motion and entering into the record a definitive statement of the Court's position regarding the recognition and enforcement of the Defendant's constitutional rights.**

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully moves this Court to enter an order verifying and affirming the recognition, application, and protection of the Defendant's constitutional rights for the duration of these proceedings, and to issue any other relief deemed just and proper.

Submitted by:
/s/ [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Verify Recognition and Protection of Constitutional Rights was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106388299
Filing Code Description: Motion
Filing Description: Motion to Verify Recognition and Protection of Constitutional Rights
Status as of 10/2/2025 4:03 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 3:59:53 PM	SENT
[redacted]		[redacted]	10/2/2025 3:59:53 PM	SENT

Received and E-Filed for Record
10/2/2025 4:06 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO QUASH WARRANT AND RESTORE BOND

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and respectfully moves this Court to quash the outstanding warrant issued on or about October 7, 2019, for alleged failure to appear and to restore or refund the previously posted bond. In support of this Motion, the Defendant states as follows:

1. **The Defendant was present in court on September 30, 2019, as confirmed by multiple facts including the following:**

   a. Defendant filed and submitted three affidavits and a counterclaim to the court clerk on that date, which were accepted into the official record.

   b. The "Order of Attorney Appointment" for Attorney David Bluestein was signed and entered on the morning of September 30, 2019, specifically indicating that the Defendant was present.

   c. Defendant personally met with Attorney David Bluestein immediately following the court session in the courthouse corridor.

2. **Despite the Defendant's physical presence in court on September 30, 2019, an "Order for Issuance of Capias" was issued on October 7, 2019, falsely asserting that the Defendant failed**

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to appear and ordering forfeiture of the $750 bond along with issuance of a $10,000 capias warrant.

3. **The bailiff's certificate supporting the capias is inconsistent with court records and improperly claims the Defendant failed to appear when called, despite the Defendant being inside the courtroom during docket call and seen by court personnel.**
4. **The Defendant has confirmed with the court reporter, Sally Hepburn, that the official transcripts from September 30, 2019, include clear evidence of the Defendant's presence. Ms. Hepburn has acknowledged this via email but has refused to file the transcript unless the Defendant purchases a copy for $100.**
5. **The issuance of a capias warrant and bond forfeiture under false pretenses constitutes a miscarriage of justice and violates the Defendant's right to due process under the U.S. Constitution and the Texas Constitution.**
6. **No notice or opportunity to contest the forfeiture or address the warrant was ever provided to the Defendant, nor was the Defendant re-arrested or given an explanation for the judicial action taken in his absence.**

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court:

a. Quash the October 7, 2019 warrant;

b. Vacate the bond forfeiture and order the immediate restoration or refund of the $750 bond previously posted, and award compensatory damages in the amount of $25,000 for the significant loss of time, income, and impairment of the Defendant's ability to work and drive resulting from the wrongful issuance of the warrant and related actions;

c. Correct the court record to reflect the Defendant's appearance on September 30, 2019;

d. Grant any further relief that this Court deems just and proper.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO QUASH WARRANT AND RESTORE BOND* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106388986
Filing Code Description: Motion
Filing Description: Motion to Quash Warrant and Restore Bond
Status as of 10/2/2025 4:35 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:06:24 PM	SENT
[redacted]		[redacted]	10/2/2025 4:06:24 PM	SENT

Received and E-Filed for Record
10/2/2025 4:13 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
32
Deputy Clerk, Shari Klein

CAUSE NO 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO COMPEL CLERK TO EXPLAIN RECORD IRREGULARITIES

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and moves this Court to compel the County Clerk, Brandon Steinmann, to provide a full accounting and explanation regarding the following procedural irregularities observed in the official court record for this case:

1. **Numerous documents have been filed without any signatures or with signature lines left blank.**
2. **Certain documents contain illegible scribbles, initials, or symbols in place of actual names or identifiable signatures, making it impossible to determine who signed or authorized such filings.**
3. **Some filings bear handwritten notations, numbers, or unclear markings substituted for standardized or official identifying information.**
4. **Despite these deficiencies, these flawed documents were accepted and entered into the official court record by the Clerk's Office without correction, rejection, or further verification, which constitutes a failure to uphold procedural and statutory duties governing court records.**

WHEREFORE, the Defendant respectfully requests that the Court order the County Clerk, Brandon Steinmann, to:

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a. Provide a comprehensive list of all documents filed in this case that:

i. Were entered without signatures;

ii. Contain illegible or unreadable signatures; or

iii. Were incomplete or missing required information at the time of filing;

b. Identify by full legal name, official job title, contact information, and any available employee or identification number:

i. Every individual who signed any such document (including those with illegible signatures);

ii. Every individual who accepted, filed, or entered such documents into the official court record;

c. Provide a detailed explanation for the acceptance and filing of each deficient document, including the identity of the individual(s) who authorized their entry despite the deficiencies;

d. Furnish copies of all internal policies, procedures, manuals, or checklists utilized by the Clerk's Office to review and vet documents prior to filing in the court record.

These matters directly affect the integrity and reliability of the official court record, raise substantial due process concerns, and are necessary for the Defendant's ability to prepare a proper defense. Failure to comply with this motion may result in the Court drawing adverse inferences against the Clerk's Office and may prompt further motions or complaints regarding the administration of justice.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO COMPEL CLERK TO EXPLAIN RECORD IRREGULARITIES* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106389713
Filing Code Description: Motion
Filing Description: Motion to Compel Clerk to Explain Record Irregularities
Status as of 10/2/2025 4:36 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:13:15 PM	SENT
[redacted]		[redacted]	10/2/2025 4:13:15 PM	SENT

Received and E-Filed for Record
10/2/2025 4:21 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
:32
Deputy Clerk, Shari Klein

CAUSE NO. :32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
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VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO ACCEPT VERIFIED STATEMENT OF FACTS AND REQUIRE REBUTTAL BY OPPOSING PARTY

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and respectfully files this Motion to Accept the Verified Statement of Facts attached hereto as Exhibit A into the Court record and to require the Opposing Party to respond or rebut these facts. This Verified Statement is submitted under penalty of perjury and is based on firsthand knowledge, court documents, and official records. The Defendant requests that the Court consider these facts as established unless rebutted by admissible evidence.

Executed on this 1st day of October, 2025.

/s/ [redacted]

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Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO ACCEPT VERIFIED STATEMENT OF FACTS AND REQUIRE REBUTTAL BY OPPOSING PARTY* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106390583
Filing Code Description: Motion
Filing Description: Motion to Accept Verified Statement of Facts and Require Rebuttal by Opposing Party
Status as of 10/2/2025 4:37 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:21:38 PM	SENT
[redacted]		[redacted]	10/2/2025 4:21:38 PM	SENT

Received and E-Filed for Record
10/2/2025 4:30 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Deputy Clerk, Shari Klein

CAUSE NO. `32

STATE OF TEXAS	**§**	**COUNTY COURT AT LAW #5**
	§	
VS.	**§**	**STATE OF TEXAS**
	§	
[redacted]	**§**	**DEFENDANT (Pro Se)**

Exhibit A: Verified Statement of Facts in Support of Motion to Accept Verified Statement of Facts

I, [redacted], declare under penalty of perjury that the following facts are true and correct to the best of my knowledge:

1. On or about August 7, 2019, a document styled as a "Complaint Affidavit" was created, alleging a belief that the Defendant had intentionally prevented or obstructed an individual identified as J. Pierce from effecting an arrest or transportation. The Complaint Affidavit was signed by an unidentified affiant and an unidentified Assistant District Attorney. On that same date, a separate document titled "Information" was also created by an unidentified Assistant District Attorney. Both documents were subsequently entered into the official court record on August 9, 2019 — with the "Information" document file-stamped at 2:41 PM, and the Complaint Affidavit entered at 3:18 PM. These filings marked the first point of contact initiated by the County of Montgomery judicial system in relation to proceedings allegedly involving the Defendant.

a. Texas Penal Code § 38.03 defines the offense of resisting arrest, search, or transportation as follows:

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"A person commits an offense if he intentionally prevents or obstructs a person he knows is a peace officer or a person acting in a peace officer's presence and at his direction from effecting an arrest, search, or transportation of the actor or another by using force against the peace officer or another."

b. The Complaint Affidavit filed against the Defendant, which initiated over six years of continuous legal and personal harm, states verbatim:

"Believes or does believe that the Defendant intentionally prevented or obstructed J. Pierce, a person he knows is a peace officer, from effecting an arrest, search, or transportation of the Defendant by using force against the peace officer."

This affidavit was signed by two unknown individuals whose signatures are illegible and whose identities remain undisclosed.

This Complaint Affidavit fails to meet the legal standards of specificity and factual certainty required for such sworn statements. The use of ambiguous language such as "believes or does believe" evidences uncertainty rather than factual knowledge and renders the affidavit inherently unreliable. Furthermore, the absence of clearly identified and accountable affiants undermines the affidavit's legitimacy and casts doubt on its validity.

The deficiencies in this Complaint Affidavit have contributed directly to the unlawful and ongoing harm suffered by the Defendant, including but not limited to misrepresentation in court proceedings, denial of due process, and the escalation of unjust legal actions based on unsubstantiated and vague accusations.

Furthermore, the Complaint Affidavit that initiated these proceedings was not reviewed or sworn before an impartial judicial officer. Instead, it was sworn and signed solely by the unidentified affiant and an unidentified Assistant District Attorney (ADA) — who simultaneously acted as the verifying authority. This raises a clear and irreconcilable conflict of interest, as the prosecuting office cannot impartially serve as both the author and the authenticating witness of the very document it uses to justify prosecution.

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Under Texas Government Code § 602.002(4), a district or county attorney may administer oaths; however, when that authority is used to self-authenticate an affidavit for which the prosecutor directly benefits, it constitutes a breakdown in the separation of powers and a violation of the Defendant's right to due process.

No neutral magistrate reviewed or verified the allegations, and the vague language used — including "believes or does believe" — further illustrates that the affidavit lacks the specificity and factual foundation required by law. This procedural defect renders the affidavit inherently unreliable and calls into question the lawful basis for the case itself.

2. The Defendant voluntarily appeared at the courthouse on September 30, 2019, in response to a court directive. The Defendant was physically present at the courthouse and delivered filings to the clerk's office, which were time-stamped shortly after submission.

a. It is a matter of public record and commercial fact that the State of Texas operates as a corporate legal fiction, functioning within the broader corporate hierarchy of government entities established under the Government of the United States, which itself is listed as the ultimate parent in numerous public registries, including the D-U-N-S® (Data Universal Numbering System). While the State of Texas may claim sovereign status in relation to other states, it is not sovereign in relation to the Government of the United States, under which it is statutorily bound and commercially subordinate. It exists and functions as a child governmental corporation, operating under federally imposed rules, financial obligations, and administrative structures.

b. Within this same hierarchy, County of Montgomery — styled as County of Montgomery, Inc. — is likewise a municipal sub-corporation, functioning as a child entity under the corporate umbrella of the State of Texas. This cascading structure reveals a commercial chain of command, wherein each "governmental" body operates within a corporate-commercial framework, employing the lexicon of governance while acting under the liabilities, incentives, and operational mechanisms of business.

c. These entities generate substantial revenue not merely through traditional taxation, but more significantly through enforcement mechanisms (fines, fees, arrests, asset forfeitures,

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court costs), and the sale of rights and privileges in the form of licenses and permits. These acts — including the adjudication of criminal and civil matters — are conducted not solely in the public interest, but with a measurable financial motive. Officers, agents, and agencies involved (including judges, prosecutors, sheriffs, clerks, and jailers) are financially incentivized actors operating within an administrative revenue model.

d. Understanding this structure is vital in assessing the conduct of all involved parties. Actions taken by agents of these corporate-governmental entities — particularly those which violate due process, deny fundamental rights, or act outside constitutional bounds — must be recognized not as abstract procedural errors, but as acts of commercial liability, committed under color of law by agents operating in commerce, under oath and fiduciary duty.

3. The Defendant was driven to court on that day by his mother, who remained on-site as a witness to the appearance.

4. On September 30, 2019, the Defendant was physically present at the Montgomery County courthouse and personally entered multiple sworn documents and affidavits into the official court record. These filings — each time-stamped and recorded by County Clerk Mark Turnbull — included:

a. A Notice of Counterclaim entered at 11:19 AM;

b. A Montgomery County Sheriff's Office Release and Hold Harmless Agreement, signed "No Contract" and initialed by Sergeant Dodson, Badge #5355, entered at 11:20 AM;

c. An Affidavit of Sovereignty entered at 11:21 AM;

d. An Affidavit of Notice of Liability entered at 11:22 AM;

e. An Affidavit of Claim & Title entered at 11:24 AM.

These lawful filings, made under penalty of perjury, stand unrebutted in the court's own record and were submitted approximately thirty minutes prior to the Defendant meeting, in person, with court-appointed attorney David Bluestein [02510700] — an interaction witnessed by the Defendant's mother.

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5. In spite of irrefutable evidence of his physical presence and lawful participation that day, a fraudulent, fictitious, and procedurally manufactured Failure to Appear (FTA) was entered into the record. This act reflects a calculated administrative deception — not a clerical error — and directly contradicts all verifiable facts:

a. The time-stamped entries of official documents filed into the court system;

b. Eyewitness testimony of the Defendant's presence in the courtroom and courthouse corridors;

c. The acknowledgment of the Defendant by state actors, including Sergeant Dodson and attorney David Bluestein [02510700].

This FTA — constructed in defiance of truth — exemplifies the use of deceptive administrative tactics by compensated agents acting under the corporate banner of the State of Texas and County of Montgomery, designed to entrap, suppress, and retaliate against the Defendant's lawful assertion of rights and due process. These events form part of a larger pattern of procedural abuse, psychological coercion, and state-sponsored obfuscation — tactics reflective of intelligence-grade behavioral manipulation, weaponized bureaucracy, and institutional bad faith.

6. Immediately after the September 30 court appearance, the Defendant met with a second court-appointed attorney, David Bluestein [02510700], in the hallway on the 2nd floor right outside the courtroom, who was assigned following the termination of the first court-appointed attorney, Darin John Ray [24003718].

7. David Bluestein [02510700] refused to discuss the case and instead asked irrelevant personal questions, such as the Defendant's educational background and marital status.

8. The Defendant remained as one of the last individuals in the courtroom, excluding court personnel, on September 30, 2019.

9. The Defendant was never formally informed that Darin John Ray [24003718] had withdrawn as counsel, and the only notification on record is a Certificate of Service which incorrectly identifies the notified party in the District Attorney's office.

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10. Darin John Ray's "Motion to Withdraw as Counsel," e-filed September 30, 2019 at 2:04 PM, falsely claims that the Defendant's inability to work with counsel was the cause of the motion.

11. On the first court date, August 21, 2019, Darin John Ray [24003718] failed to appear in court, nor did he notify that he would not be showing up, and instead sent an unidentified woman who attempted to coerce the Defendant into signing a "Scheduling Order" document. This document was already pre-signed by an unknown party and included blank fields for critical information such as the bar number and the assistant district attorney's signature. The Defendant was pressured to sign this document without having full knowledge or consent of its contents, which raises serious concerns about due process and the integrity of court procedures. This act further exemplifies the pattern of procedural irregularities, coercion, and lack of transparency in the handling of the Defendant's case. The acting judge Keith Stewart was well aware of the tactic being used and allowed it.

12. During the entire time that Darin John Ray [24003718] was listed as the Defendant's attorney of record, there was only one direct interaction between him and the Defendant. That interaction occurred on September 30, 2019, halfway through the session, and at no point did Ray make a genuine effort to work with the Defendant.

13. After meeting David Bluestein [02510700] for the first and only time on September 30, 2019, in the courthouse hallway, the Defendant had no further communication with him.

14. In a May 6, 2020 filing titled "Motion to Withdraw as Attorney of Record," Bluestein falsely stated that the Defendant failed to appear on September 30, 2019 and had not been rearrested.

15. This statement is materially false, as the Defendant met David Bluestein [02510700] in person on September 30, 2019, immediately following the court session. The interaction took place in the corridor outside of the courtroom, where Bluestein approached the Defendant and engaged in conversation. This meeting was witnessed by the Defendant's mother, who remained present throughout. The assertion that the Defendant "failed to appear" on that date is therefore knowingly false and constitutes a misrepresentation of the factual record.

16. Bluestein further stated that the Defendant requested a new attorney and was entitled to one, which is also false as the Defendant was never informed or requested a new attorney.

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17. As of September 26, 2025, no new attorney has been appointed or contacted the Defendant.

18. Bluestein's Certificate of Service filed with his motion indicates service to the District Attorney's office but does not mention any service or contact with the Defendant.

19. On October 4, 2019, a "Bailiff Certificate for Bond Forfeiture" was filed, stating that the bailiff called the Defendant's name in the courthouse corridors, allowed reasonable time for appearance, and that the Defendant "wholly made default."

20. This certificate was signed by Bailiff R. Van Howten and an illegible county clerk signature but contradicts the Defendant's verified appearance on September 30, 2019.

21. On October 7, 2019, a Capias (warrant of arrest) was issued and entered into court records at 3:00 PM, citing the Defendant's failure to answer when called in court on September 30, 2019.

22. The Capias document is signed by Acting Judge Keith Stewart and Deputy Clerk Heather Chastun but does not list the District Attorney's name who purportedly moved for bond forfeiture and arrest warrant issuance.

23. An additional "Capias – Order of Arrest (Failure to Appear)" document exists in the court records without a timestamp or date and is signed by Deputy Clerk Heather Chastun.

24. The absence of a timestamp or date on this document is irregular and raises questions about its validity.

25. The Defendant has a telephone recording of a conversation with Tina Long, court administrator for County Court at Law #5, who confirmed she saw the Defendant in court on September 30, 2019.

26. When asked about the issuance of a warrant on that day, Ms. Long refused to provide an explanation and hung up the phone on the Defendant.

27. In an email correspondence, Sally Hepburn, court reporter for County Court at Law #5, confirmed possession of court transcripts for the September 30, 2019 session involving the Defendant.

28.. Hepburn demanded $100 for the transcript and refused to enter the transcript into the court record without payment.

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29. The Defendant declined payment but requested that the transcript be entered into the court record as it would prove his appearance and disprove the fraudulent warrant.

30. Hepburn ceased communication after this request and has not responded further.

31. The Defendant is a natural living man, not a corporate fiction, and retains all natural rights under common law and constitutional protections.

32. The actions, omissions, and false statements by court personnel, attorneys, and officials constitute neglect, bad faith, and violations of due process.

33. The failure to provide effective legal representation and to properly communicate with the Defendant undermines the validity of any active case, warrant, or order issued in this matter.

34. The Defendant has endured severe and ongoing personal and professional harm, including the loss of government identification, licenses, income, the ability to work and drive, and sustained emotional and legal distress for more than six years. These injuries have been directly caused by the deliberate, coordinated, and financially motivated actions of agents operating under State of Texas Inc. and County of Montgomery Inc., whose conduct reflects a pattern of systemic abuse, deprivation of rights, and coercive tactics designed to break down the will, livelihood, and standing of the Defendant.

35. This Affidavit is submitted for the purpose of establishing a clear, accurate, and lawful record of events, supported by firsthand knowledge and evidence. It stands as a formal demand for accountability from court officers and agents whose conduct has resulted in harm, deprivation of rights, and procedural violations. It also serves as foundational support for the filing of related lawful instruments, including but not limited to a Motion to Recuse the Presiding Judge, and any other lawful or equitable remedies deemed necessary and appropriate by the Defendant.

Executed on this 1st day of October, 2025.

/s/ [redacted]

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Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *Exhibit A: Verified Statement of Facts in Support of Motion to Accept Verified Statement of Facts* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 106391466
Filing Code Description: Motion
Filing Description: Exhibit A-Verified Statement of Facts in Support of Motion to Accept Verified Statement of Facts
Status as of 10/2/2025 4:38 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:30:30 PM	SENT
[redacted]		[redacted]	10/2/2025 4:30:30 PM	SENT

Received and E-Filed for Record
10/2/2025 4:34 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
:32
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION FOR DISCOVERY OF COMPLETE CASE MATERIALS

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing *pro se*, and pursuant to the Texas Code of Criminal Procedure Article 39.14 ("Michael Morton Act"), the Due Process Clause of the Fourteenth Amendment to the United States Constitution, Brady v. Maryland, 373 U.S. 83 (1963), and all other applicable rules and constitutional provisions governing the right to discovery, respectfully submits this Motion for Discovery of all evidence, records, and materials relevant to the alleged incident and arrest occurring on or about August 7, 2019.

This motion is made in good faith and is necessary to ensure a fair, transparent, and constitutionally sound defense. The Defendant asserts the following:

I. REQUESTED MATERIALS

The Defendant specifically requests that the prosecution and any associated government agencies promptly produce the following materials in full:

a. All Records, Files, and Documents:
All written or electronic records, files, notes, internal memos, reports, filings, emails, or other communications in the possession of the District Attorney's Office pertaining to the arrest,

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investigation, detention, and prosecution of the Defendant, including all materials created before, during, and after the alleged incident.

b. Correspondence and Activity of Assistant District Attorneys:
All documentation, including emails, internal memos, meeting notes, and communications involving Assistant District Attorneys Darin John Ray [#24003718] and David Bluestein [#02510700], specifically addressing:

- **Their dates of assignment to this case.**
- **The scope and nature of their involvement.**
- **Any requests, motions, filings, or communications submitted by them in connection to this matter.**

c. Montgomery County Sheriff's Office Records:
All records held by the Montgomery County Sheriff's Office pertaining to the arrest, processing, booking, detention, or release of the Defendant on August 7, 2019, including but not limited to:

- **Incident reports.**
- **Arrest affidavits.**
- **Booking records.**
- **Surveillance footage.**
- **Body cam and dash cam footage.**
- **Internal communications related to the Defendant.**

d. Detention Facility Documents:
All records generated by or within any detention facility during or following the Defendant's arrest, including:

- **Intake forms.**

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- **Logs.**
- **Medical evaluations.**
- **Phone recordings and logs.**
- **Jail activity reports.**

e. Witness Lists and Statements:

A complete list of all witnesses identified or consulted in this case, including:

- **Full names.**
- **Job titles or relationships to the case.**
- **Contact information.**
- **Statements, interviews, summaries, or other related materials.**

f. Charging Instruments and Legal Filings:

A full and complete copy of all legal documents filed or created in this matter, including but not limited to:

- **Complaint affidavits.**
- **Charging instruments.**
- **Informations.**
- **Indictments.**
- **Warrants.**
- **Capias documents.**
- **Bond forfeiture filings.**

g. Identification of All Prosecutors Involved:

A full list of all Assistant District Attorneys who have had any interaction with or made any filings in this matter, along with:

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- **Dates of involvement.**
- **Nature and scope of duties performed.**
- **Any ex parte communications, filings, or authorizations made without Defendant's knowledge.**

h. Exculpatory Evidence and Brady Material:
Any and all exculpatory evidence known to the State or any of its agents, whether or not intended for use at trial, including but not limited to:

- **Evidence that may mitigate punishment.**
- **Evidence that may contradict the prosecution's theory.**
- **Evidence impeaching any State witness.**
- **Evidence corroborating the Defendant's statements or testimony.**

II. LEGAL GROUNDS FOR DISCOVERY

The Defendant invokes the following legal authorities in support of this request:

- **Brady v. Maryland, 373 U.S. 83 (1963): Requiring the prosecution to turn over all exculpatory evidence to the defense.**
- **Texas Code of Criminal Procedure, Article 39.14: Entitling the Defendant to inspect and obtain any evidence in the possession of the State related to the alleged offense.**
- **U.S. Const. Amend. V, VI, and XIV: Guaranteeing due process, the right to confront witnesses, and a fair trial.**
- **Texas Constitution, Article I, Sections 10 and 19: Guaranteeing rights to due course of law and to be informed of the nature and cause of the accusation.**

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III. NOTICE OF PRESERVATION AND FUTURE USE

The Defendant explicitly requests that all materials responsive to this Motion be preserved in full, unaltered form. Any failure to provide timely disclosure or any evidence of spoliation, withholding, or redaction may serve as grounds for further motions including:

- **Motion to Suppress Evidence**
- **Motion to Dismiss for Due Process Violations**
- **Motion for Sanctions**
- **Motion to Compel Discovery**

IV. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Honorable Court:

1. **Grant this Motion for Discovery in full;**
2. **Order the State to produce all requested items within the time frame prescribed by law or a deadline set by this Court;**
3. **Enter any other relief to which the Defendant may be justly entitled.**

Executed on this 1st day of October, 2025.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR DISCOVERY OF COMPLETE CASE MATERIALS* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106391882
Filing Code Description: Motion
Filing Description: Motion for Discovery of Complete Case Materials
Status as of 10/2/2025 4:38 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:34:29 PM	SENT
[redacted]		[redacted]	10/2/2025 4:34:29 PM	SENT

Received and E-Filed for Record
10/2/2025 4:39 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

Motion to Compel Production of Court Transcripts and Request for Affidavits

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and files this *Motion to Compel Production of Court Transcripts and Request for Affidavits* related to the hearing on September 30, 2019. This motion seeks:

1. **The compelled inclusion of official court transcripts from the September 30, 2019 hearing into the court record; and**
2. **A formal request for affidavits from the following individuals attesting to their personal knowledge, observations, and whereabouts concerning the Defendant's physical presence in court on that date:**

   a. Acting Judge Keith Stewart
   b. Court-Appointed Attorney David Bluestein
   c. Court-Appointed Attorney Darin John Ray
   d. Bailiff R. Howton
   e. Assistant District Attorney (Name Unknown)
   f. Court Administrator Tina Long

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Exhibit:_____

g. Sally Hepburn, Court Reporter

h. Security personnel who guarded the courtroom door, identified as Ms. Acosa (blonde-haired woman) and Mr. Weatherford (male)

I. BACKGROUND

1. **The Defendant appeared in court on September 30, 2019, and submitted three affidavits and a counterclaim which were accepted into the official court record.**
2. **The Defendant personally met with court-appointed attorney David Bluestein in the courtroom corridor after the court session on September 30, 2019.**
3. **Despite the Defendant's presence, an "Order for Issuance of Capias" was later entered falsely claiming the Defendant failed to appear on September 30, 2019.**
4. **To verify the Defendant's actual attendance, court transcripts from the hearing on September 30, 2019, are necessary and have not yet been filed or produced.**
5. **The Defendant requests the Court to compel the court reporter to provide a certified copy of these transcripts to establish the Defendant's presence.**
6. **The Defendant further requests the Court to order affidavits from the court-appointed attorneys, Darin John Ray and David Bluestein, stating whether they were physically present in court or in the hallway or corridor and whether they personally saw the Defendant on September 30, 2019.**
7. **These affidavits are necessary to clarify any disputes regarding the Defendant's attendance and to address inaccuracies that have led to bond forfeiture and a warrant.**
8. **Sally Hepburn, the court transcriber, was contacted via email and confirmed that she has reviewed the transcripts from the September 30, 2019 court session. She verified that the Defendant is present in those transcripts. Ms. Hepburn demanded $100 for the Defendant to purchase a copy of the transcripts. The Defendant requested that she place the transcripts into the official court record, but she refused, stating that she must sell the Defendant the**

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transcripts before he can use them as he wishes. The Defendant's sole purpose for obtaining the transcripts is to prove his physical presence in court on September 30, 2019—the same day that Acting Judge Keith Stewart, Bailiff R. Howton, an unknown Assistant District Attorney, Court-Appointed Attorney David Bluestein, and Court Administrator Tina Long all acted together to issue a fraudulent $10,000 warrant for failure to appear and to forfeit the Defendant's $750 bond.

II. REQUEST FOR RELIEF

WHEREFORE, the Defendant respectfully requests that this Court:

a. Compel the production and filing of the official court transcripts from the hearing held on September 30, 2019.

b. Order court-appointed attorneys Darin John Ray and David Bluestein to provide sworn affidavits regarding their presence or absence and any direct observation of the Defendant on September 30, 2019.

c. Grant any other relief to which the Defendant may be justly entitled.

III. PRAYER

The Defendant prays that the Court grant this Motion and any other relief deemed appropriate and necessary to ensure a fair and accurate record of the Defendant's court attendance.

Submitted by:
/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Compel Production of Court Transcripts and Request for Affidavits was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106392403
Filing Code Description: Motion
Filing Description: Motion to Compel Production of Court Transcripts and Request for Affidavits
Status as of 10/2/2025 4:40 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:39:09 PM	SENT
[redacted]		[redacted]	10/2/2025 4:39:09 PM	SENT

Received and E-Filed for Record
10/2/2025 4:39 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
32
Deputy Clerk, Shari Klein

CAUSE NO 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

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Exhibit:_____

g. Sally Hepburn, Court Reporter

h. Security personnel who guarded the courtroom door, identified as Ms. Acosa (blonde-haired woman) and Mr. Weatherford (male)

I. BACKGROUND

1. **The Defendant appeared in court on September 30, 2019, and submitted three affidavits and a counterclaim which were accepted into the official court record.**
2. **The Defendant personally met with court-appointed attorney David Bluestein in the courtroom corridor after the court session on September 30, 2019.**
3. **Despite the Defendant's presence, an "Order for Issuance of Capias" was later entered falsely claiming the Defendant failed to appear on September 30, 2019.**
4. **To verify the Defendant's actual attendance, court transcripts from the hearing on September 30, 2019, are necessary and have not yet been filed or produced.**
5. **The Defendant requests the Court to compel the court reporter to provide a certified copy of these transcripts to establish the Defendant's presence.**
6. **The Defendant further requests the Court to order affidavits from the court-appointed attorneys, Darin John Ray and David Bluestein, stating whether they were physically present in court or in the hallway or corridor and whether they personally saw the Defendant on September 30, 2019.**
7. **These affidavits are necessary to clarify any disputes regarding the Defendant's attendance and to address inaccuracies that have led to bond forfeiture and a warrant.**
8. **Sally Hepburn, the court transcriber, was contacted via email and confirmed that she has reviewed the transcripts from the September 30, 2019 court session. She verified that the Defendant is present in those transcripts. Ms. Hepburn demanded $100 for the Defendant to purchase a copy of the transcripts. The Defendant requested that she place the transcripts into the official court record, but she refused, stating that she must sell the Defendant the**

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Exhibit:_____

transcripts before he can use them as he wishes. The Defendant's sole purpose for obtaining the transcripts is to prove his physical presence in court on September 30, 2019—the same day that Acting Judge Keith Stewart, Bailiff R. Howton, an unknown Assistant District Attorney, Court-Appointed Attorney David Bluestein, and Court Administrator Tina Long all acted together to issue a fraudulent $10,000 warrant for failure to appear and to forfeit the Defendant's $750 bond.

II. REQUEST FOR RELIEF

WHEREFORE, the Defendant respectfully requests that this Court:

a. Compel the production and filing of the official court transcripts from the hearing held on September 30, 2019.

b. Order court-appointed attorneys Darin John Ray and David Bluestein to provide sworn affidavits regarding their presence or absence and any direct observation of the Defendant on September 30, 2019.

c. Grant any other relief to which the Defendant may be justly entitled.

III. PRAYER

The Defendant prays that the Court grant this Motion and any other relief deemed appropriate and necessary to ensure a fair and accurate record of the Defendant's court attendance.

Submitted by:
/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Compel Production of Court Transcripts and Request for Affidavits was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 106392403
Filing Code Description: Motion
Filing Description: Motion to Compel Production of Court Transcripts and Request for Affidavits
Status as of 10/2/2025 4:40 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/2/2025 4:39:09 PM	SENT
[redacted]		[redacted]	10/2/2025 4:39:09 PM	SENT

Received and E-Filed for Record
10/3/2025 12:44 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Deputy Clerk, Shari Klein

CAUSE NO. :32

STATE OF TEXAS	**§**	**COUNTY COURT AT LAW #5**
	§	
VS.	**§**	**STATE OF TEXAS**
	§	
[redacted]	**§**	**DEFENDANT (Pro Se)**

MOTION FOR CERTIFIED, COMPLETE, PAGINATED CASE FILE

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and moves the Court to order the Clerk to provide certified copies of the entire case file under the following conditions:

1. **The entire case file shall be produced as one complete package, bound together and sequentially paginated with page numbers in the format "Page X of Y." A detailed table of contents indexing all included documents shall be included at the beginning.**
2. **For any document lacking a fully legible signature, printed full name, title/position, or business contact information of the individual signing or annotating, the Clerk shall provide a supplemental document clearly identifying such individual with all required information.**
3. **The package shall be delivered by certified mail, return receipt requested, to the following entity:**
   DRACO & COMPANY:
4. **The package shall also be provided in searchable PDF format via email to:**

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5. **The Clerk shall document and provide a complete, verifiable chain of custody for the delivery of the certified case file package. This includes all handling steps from the Clerk's office to final delivery, supported by:**
    - **A signed delivery log or equivalent record from the Clerk's office,**
    - **The certified mail receipt with tracking information,**
    - **The return receipt signed by the recipient entity, and**
    - **Any additional documentation proving continuous custody and proper handling during transit.**

    Failure to provide this full documentation will be considered non-compliance with this order.
6. **The Clerk shall comply with this order no later than [date].**
7. **If the Clerk fails to comply with any part of this order within the specified deadline, Defendant will seek further relief or sanctions to compel full compliance.**

WHEREFORE, Defendant requests the Court grant this motion and order the Clerk of Courts to comply fully and immediately as set forth above.

Signed this October 3, 2025.

/s/ [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR CERTIFIED, COMPLETE, PAGINATED CASE FILE* was delivered to the Montgomery County District Attorney's Office on this 3rd day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106424047
Filing Code Description: Motion
Filing Description: Motion for Certified, Complete, Paginated Case File
Status as of 10/3/2025 12:52 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/3/2025 12:44:50 PM	SENT
[redacted]		[redacted]	10/3/2025 12:44:50 PM	SENT

Received and E-Filed for Record
10/3/2025 12:50 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
\2
Deputy Clerk, Shari Klein

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION FOR DETAILED CHAIN OF CUSTODY AND CERTIFIED COMPLETE CASE FILE

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and moves the Court to order the Clerk of Courts to provide a certified, complete, and paginated copy of the entire case file, including a detailed chain of custody record for each individual document filed in this case.

1. Certified Complete Case File:
Defendant requests the Clerk provide a full package containing every document filed, bound and sequentially paginated (e.g., "Page 1 of X"), with each page numbered to prevent omissions or confusion. The package shall be provided both:

- **Physically: as a bound, paginated hard copy delivered by certified mail with return receipt to: DRACO & COMPANY:**
- **Digitally: as a complete PDF sent to**

2. Chain of Custody Documentation:
For each document included in the case file, Defendant requests a detailed chain of custody record documenting:

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- **The full name, title, and business contact information of every person who handled the document from its creation to filing, storage, and delivery,**
- **The method and exact date of delivery or transfer at each stage,**
- **The full name, title, and business contact information of every person who received or accepted the document at each step,**
- **All signatures, dates, and times evidencing continuous custody and proper handling.**

This chain of custody documentation shall be presented as individual annotations attached immediately following each corresponding document in the package, clearly linked and itemized.

3. Sworn Affidavit and Certification:

At the conclusion of the package, the Clerk of Courts shall provide a sworn affidavit attesting that the case file and accompanying chain of custody documentation are complete, accurate, and true to the best of their knowledge. This affidavit must:

- **Be signed by the Clerk of Courts, with a printed full name and signature line,**
- **Be notarized by an impartial third-party not connected to the prosecution or any conflict of interest,**
- **Explicitly state that no person from the District Attorney's office or any party with a conflict of interest has authorized or swore to this affidavit.**

4. Deadline and Urgency:

Defendant requests the Court order the Clerk to comply with this motion within 14 calendar days from the date this Order is signed by the Court. This deadline is strict and non-negotiable.

5. Explanation of Missing Information:

Should any part of the chain of custody documentation be incomplete, missing, or otherwise unavailable, the Clerk shall provide a written explanation certifying the reasons for such gaps.

6. Urgency and Impact Statement:

Defendant has endured over six years of delay and neglect in this case, which has severely and

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continuously harmed Defendant's personal and professional life, including loss of driving privileges, inability to work in their trade, and disruption to their livelihood. Each additional day of delay results in irreparable harm and financial loss. Accordingly, Defendant requests the Court to treat this case, including this motion and all related matters, with the highest priority and enforce the deadlines herein with no tolerance for further delay.

WHEREFORE, Defendant requests the Court grant this motion and order the Clerk of Courts to comply fully and immediately as set forth above.

Signed this October 3, 2025.

/s/ [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR DETAILED CHAIN OF CUSTODY AND CERTIFIED COMPLETE CASE FILE* was delivered to the Montgomery County District Attorney's Office on this 3rd day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106424436
Filing Code Description: Motion
Filing Description: Motion for Detailed Chain of Custody and Certified Complete Case File
Status as of 10/3/2025 12:53 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/3/2025 12:50:42 PM	SENT
[redacted]		[redacted]	10/3/2025 12:50:42 PM	SENT

Received and E-Filed for Record
10/8/2025 12:05 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Cause 32
Deputy Clerk, Katherine Burns

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION FOR EQUAL SOVEREIGN STANDING

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted]**, appearing pro se,** and moves this Court for Judicial Clarification and Permission to Present Defense.

State of Texas, Inc. is a recognized "legal fiction" that operates with sovereign and qualified immunity. The Defendant is a natural person, hereinafter styled as the "living natural man" — not a "legal fiction" — yet is being compelled to appear and respond as though standing on equal legal terms with the State's sovereign entity.

This creates a fundamental imbalance. A fair trial **is not possible** unless both parties — the living man and the State's "legal fiction" — are recognized as being on the **same legal footing**. It is the duty of this Court, acting as an impartial arbiter, to either reduce the standing of the State's "legal fiction" or elevate the Defendant's standing accordingly to ensure equity and due process.

The Defendant therefore moves this Court to clarify, on the record, whether such legal parity will be recognized and upheld before this matter proceeds to trial.

STATEMENT OF FACTS

1. When the law governs disputes between one human being and another human being, both parties are presumed to share equal rights, equal legal standing, and the same protections under the law. However, when a living human is brought into opposition with a corporate fiction such as State of

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Texas, Inc., this equality is destroyed. The corporate fiction, as a sovereign entity, enjoys immense power, sovereign and qualified immunity, and the ability to act through agents while shielding itself from liability. The living human, in contrast, is reduced to a subject of the sovereign fiction—bound to it, deprived of equal standing, and denied the same immunities. This condition is fundamentally incompatible with the concept of a fair trial. Because the Court's role is to serve as an impartial mediator, it must either strip State of Texas, Inc. of its sovereign status and reduce it to the level of a mere human party, or elevate the living human to the same sovereign standing and immunity as the state's "legal fiction", so that both stand equally before the Court.

2. I have thoroughly reviewed and organized years' worth of mail and documents sent to me by banks, creditors, and other corporate entities. In doing so, I separated all correspondence into two distinct categories based on how my name was styled: one set addressed to my proper name in standard capitalization, and the other addressed to the all-capital-letter version of the name—each reflecting a separate legal and functional identity.

   This demonstrates a consistent, deliberate distinction in practice:

   a. The proper noun name is used to address and solicit the living human.

   b. The all-capital-letter name is used to manage and operate the legal/financial accounts associated with the Social Security Number.

   In every case, once an account was opened by me as the living human under my proper noun name, the account itself was recorded, maintained, and corresponded to under the all-capital-letter version of the name.

   Based on this documented pattern, the legal/financial system distinguishes between two capacities:

   c. The living man as the authorized representative.

   d. The all-capital-letter name as the "legal fiction"/financial transmitting utility entity in the commercial pipeline.

3. According to Dun & Bradstreet, the corporate family structure connected to this case is as follows:

   a. The ultimate parent corporation is Government of the United States [Inc.].

   b. State of Texas [Inc.] is a parent corporation under the federal government.

   c. County of Montgomery [Inc.] is a child corporation under State of Texas.

   d. The following entities are subsidiaries or quasi-public, private for-profit corporations under County of Montgomery [Inc.]:

   i. Montgomery County District Attorney [Inc.]

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ii. County Court at Law 5 [Inc.]

iii. Justice of the Peace 3 [Inc.]

iv. Montgomery County Sheriff's Office [Inc.]

Dun & Bradstreet reported that the County of Montgomery[Inc.] generated $400 million in revenue at one point.

4. These municipal government corporations generate revenue primarily through taxation (including property and sales taxes), permits and licensing fees (such as business licenses, building permits, and vehicle registrations), fines and penalties (including traffic tickets and code violations), court costs and administrative charges (filing fees, docket fees, transcript fees), bonds and forfeitures (bail bonds and bond forfeitures), and incarceration-related fees such as daily jail fees, probation and parole fees, electronic monitoring charges, medical co-pays, and mandatory program costs. Additional revenue sources include asset seizures and civil forfeitures, impact fees for development, utility surcharges, inspection fees (health, fire, building), franchise fees, vehicle impound and tow fees, and various other regulatory and administrative levies imposed under the guise of government operations.

5. A prime example of how government corporations generate revenue is by manufacturing criminal cases for their own and their agents' financial benefit—something I have personally experienced firsthand as the defendant.

   a. I am not permitted to bring my own recording device into court for my defense and must rely on the County Court at Law 5 [Inc.] to record proceedings.

   b. If I want court transcripts entered into the official record, I must not only pay $100 out of pocket but also do the work myself to request and submit them—requests which can ultimately be denied at the discretion of the State and its agents, who act as the gatekeeping masters over my access to due process, a fair trial, and attempt to seek justice.

   This system shows these governmental corporations operate as quasi-public, private for-profit entities, generating revenue from defendants and participants, impacting my ability to present an adequate defense.

6. Capitalization and Computer Systems
   a. Computers are case-sensitive and inherently distinguish uppercase (all-caps) names from proper noun formats as separate entities.
   b. Corporate record-keeping systems deliberately treat the all-caps name and the proper noun name as related but distinct, maintaining parallel records for the living natural man and the "legal fiction". This distinction reflects the commercial nature of the "legal fiction" separate from the living human.

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7. Capitalization as a Financial Concept
   a. In finance, “capitalization” refers to the assignment of monetary value or capital to an entity.
   b. The term “capital letters” for uppercase characters is not arbitrary; it reflects the commercial process of capitalizing the "legal fiction" as an asset. Without this commercial context, uppercase letters would simply be called “uppercase” rather than “capital” letters. Thus, the use of capital letters in "legal fiction" names symbolizes and functions as the capitalization of the "legal fiction", distinguishing it from the living human.

LEGAL AND CONCEPTUAL FRAMEWORK

1. The legal system recognizes the existence of "legal fictions", including corporations, government entities, and other artificial entities created and recognized by law.

   a. A “legal fiction” is any artificial person or entity that exists only because recognized by law.

   b. The “living man” is the natural living human — the flesh and blood individual distinct from any "legal fiction".

   c. The Social Security Number (SSN) is a federal identifier assigned to the "legal fiction", to which the natural living human is bound and dependent within the current legal system.

2. Modern criminal law frames crimes as offenses “against the peace and dignity of the State,” a sovereign "legal fiction". This reveals a disturbing hierarchy in which the institutional interests of the State are held in higher regard than the rights or harm suffered by any natural living human. By positioning itself as both the injured party and the prosecutor—while also enjoying sovereign and qualified immunity—the State inherently dominates the legal arena. The natural living human is reduced to a subordinate role, stripped of equal standing, and effectively placed beneath the authority of a corporate fiction. This arrangement violates the principle of fairness and due process, making any notion of a truly impartial or balanced trial fundamentally impossible.

   a. Cases are typically styled “State v. Defendant” because the State acts as the prosecuting entity.

   b. Agents of State of Texas, Inc.—including prosecutors, police, officials, and all members of its legal societies—do not act as neutral actors but as representatives of the sovereign "legal fiction" itself. They enjoy sovereign or qualified immunity granted by that fiction, shielding them from the very liabilities and consequences they impose on natural living humans. In practice, this makes them the true “sovereign citizens,” operating above accountability while compelling obedience from those who are, in reality, treated as subordinates or even slaves to the system. This concentration of unchecked power and immunity within the State’s agents embodies fascism in its truest and most factual form.

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3. Legal fictions, such as State of Texas, are indeed granted certain constitutional rights, including due process and free speech. However, the State not only holds these rights but also wields the power to selectively grant, deny, or regulate the rights of natural living humans. This capacity to "pick and choose" rights places the State in a position akin to a godlike authority. Meanwhile, the natural living human is left to rely entirely on this very State to protect and uphold their rights—creating a fundamental contradiction and imbalance. The State and its entities benefit from sovereign immunity, shielding themselves from many lawsuits, which further deepens the disparity in legal standing between "legal fictions" and natural living humans.
4. The court system blurs the line between the living man and the "legal fiction", refusing to clearly recognize their distinction—directly violating what the average American has been led to believe is its duty as an impartial arbiter, even though the system may, in fact, be functioning exactly as designed to maintain control under the guise of freedom.
5. Criminal law and the justice system operate within a commercial framework.

   a. Revenue generated through fines, bonds, and fees is commercial in nature.

   b. This system benefits "legal fictions" (municipalities, states, corporations) at the expense of the natural living human.
6. The State's "legal fiction" holds sovereign status, granting it superior protections, while individuals remain subject to its jurisdiction and accountability.
7. The court, law enforcement, and others often fail to acknowledge the distinction between the living man and the "legal fiction", causing confusion and bias.

ARGUMENT

1. The Legal Fiction Prosecutes the Legal Fiction

The entity known as **State of Texas, Inc.**, a "legal fiction", does not prosecute the living man directly but instead initiates proceedings against a separate legal entity—the **all-capitalized name**, commonly referred to as a **"straw man."** This name is not merely stylistic but operates as a **commercial instrument** tied to a **Social Security Number**, identifying a **fictional corporate entity** distinct from the natural, living human.

When legal documents, summons, or charges are issued, they are directed not to the living man, but to the **"legal fiction"** identified in all-capital letters. This critical distinction is often obscured by the legal process, yet it is foundational. The **"legal fiction"** has **no life or capacity to act** on its own. It **derives all operative force** from the **living man** who is bound to it. The **fiction holds commercial value** and enjoys **sovereign and qualified immunity**, while the **living man bears the liability and consequences**.

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The entire legal process unfolds within this framework. The **State, a "legal fiction"**, with **sovereign capacity**, prosecutes another **"legal fiction"**, not the living individual. However, all penalties, restrictions, and liabilities are imposed on the **living man**, who has **no equivalent legal standing** unless the court explicitly recognizes it.

To **deny** this structure is to ignore a central legal reality: **all entities in law are, to some extent, "legal fictions"**—corporations, agencies, and even government bodies. The **living man** is the **life source** behind the fiction, yet is **not afforded the protections** that the "legal fiction" receives under sovereign doctrine.

Thus, **justice and fairness require** that this duality be **formally recognized** on the record. The Court must acknowledge that the prosecution targets the **"legal fiction"**, that the **living man is distinct** from that fiction, and that to impose liability on the living man **without equal legal standing** constitutes a **fundamental violation of equity and due process**.

2. Sovereign Immunity Grants the State Superior Legal Standing

State of Texas Inc., as a recognized sovereign "legal fiction", operates with sovereign and qualified immunity. Its agents—prosecutors, law enforcement, court officers—enjoy immunity protections that shield them from liability, even when acting in error or excess.

The living man, however, is not afforded such immunity. This results in a built-in inequality: the state fiction can act with legal protections, while the human being it targets is exposed to the full weight of prosecution and punishment. Justice demands parity in legal standing, or else impartiality is compromised.

3. The Dual Capacity Must Be Recognized for Due Process

There is a demonstrable and documented distinction between the natural living human and the "legal fiction" attached to him. The living man functions as the source of energy and capacity for the "legal fiction", but the two are not the same.

To ignore this dual capacity is to deny the factual structure upon which financial and legal systems operate. Just as banks, creditors, and government entities treat the all-capitalized "legal fiction" separately from the human being, the court must also acknowledge this structure for due process to be satisfied.

4. The Court Has a Duty to Equalize the Playing Field

In all legal proceedings, the court's role is to serve as an impartial arbiter—not as an agent of the prosecution or a mechanism for the enforcement of the interests of State of Texas Inc.

When the "legal fiction" of the state, with sovereign status and financial interest, prosecutes a living man lacking equal standing, the court must either:

a. reduce the sovereign status of the state "legal fiction" for the purposes of proceedings, or

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b. elevate the legal standing of the living man to match that of the "legal fiction".

Without this adjustment, equality before the law is denied, and the trial cannot be considered fair.

5. Legal Imbalance: Fiction vs. Man

In legal disputes between two natural persons, both are presumed to enjoy equal rights and legal standing. However, in cases where a state "legal fiction" prosecutes a natural human, that parity no longer exists.

State of Texas Inc. enters the courtroom as a sovereign commercial entity, while the human stands as a subject—stripped of immunity, disadvantaged in access, and presumed to represent a fiction that he may not even recognize. This imbalance is structurally embedded unless the court acts affirmatively to correct it.

6. All Crimes Are Commercial—And the State Profits

All crimes prosecuted by State of Texas Inc. exist within a commercial framework. The state—and its subsidiaries such as County of Montgomery Inc.—generate revenue through every prosecution via bonds, fines, fees, and court-imposed costs.

The living man faces financial harm, loss of liberty, and exposure to legal penalties, while the prosecuting "legal fiction" stands to profit. This creates a material conflict of interest: one party is financially incentivized to prosecute, while the other must bear the burden of defense under unequal terms.

This commercial relationship cannot be ignored. A fair trial requires not just procedural formality, but equal legal status between the parties. A sovereign cannot fairly prosecute a subject unless both stand on the same legal footing.

REQUEST FOR ORDER

The Defendant, appearing as the living natural man and authorized representative of the attached "legal fiction", respectfully moves this Court for an order clarifying and confirming the following before proceeding to trial:

1. That the entity styled “State of Texas” and its subdivisions—including but not limited to the District Attorney and County Court at Law, Inc.—are recognized as "legal fictions" operating under sovereign and qualified immunity.
2. That in order to ensure fairness, impartiality, and equity, the living natural man (the Defendant herein) be recognized with equal legal standing and sovereign/qualified immunity as the State’s "legal fiction", so that all legal matters occur on an equal footing.

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3. That the Court confirm on the record whether the Defendant may present a defense based upon the critical distinction between the living natural man and the attached "legal fiction" represented by the all-capitalized name.
4. That the Court recognize and clarify on the record the distinction between the natural person (the living man) and the "legal fiction" entity, acknowledging the potential conflict of interest and bias that arises from failing to distinguish between these entities.
5. That the Court confirm its impartial role as an arbiter of justice, and not as an arm, agent, or representative of the prosecuting "legal fiction".
6. That this motion and the resulting order be entered into the official court records, obtaining a time and date stamp from the County Clerk on the document.
7. That the Court provide the Defendant with a hard copy of the signed and docketed order, on official court letterhead, bearing the Judge's signature.
8. That the signed hard copy be delivered by certified, verified, and notarized mail to the Defendant at:

   DRACO & COMPANY:
9. That a PDF version of the signed and docketed order be sent to the Defendant's email address at:

WHEREFORE, the Defendant respectfully requests that the Court:

10. Issue an order clarifying and formally recognizing the Defendant's status as a sovereign living natural man with legal standing equivalent to that of State of Texas, Inc., a recognized "legal fiction" endowed with sovereign and qualified immunities.
11. Confirm whether the Defendant named in this case is treated as the "legal fiction" or the living natural man appearing herein.
12. Clarify whether constitutional rights attach to the entity named in the caption of this case.
13. Confirm whether the Defendant may present a defense based on the distinction between the living natural man and the "legal fiction".
14. Acknowledge the inherent conflict of interest and potential bias arising from the conflation of the living man with the "legal fiction".
15. Ensure that the Defendant's constitutional rights, including the right to a fair trial, due process, and equal standing, are fully protected throughout the proceedings.

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16. Confirm the Court's impartial role and willingness to allow the Defendant to present his defense without prejudice.
17. Grant any other relief that the Court deems just and proper.

CONCLUSION

18. The purpose of this motion is to establish a clear and enforceable framework that:
    a. Protects the Defendant's right to a fair trial;
    b. Guards against jurisdictional overreach and procedural impropriety;
    c. Exposes and addresses any substantive or procedural errors arising from the failure to distinguish between the living natural man and the attached "legal fiction".
19. Without such an order, true impartiality and justice in these proceedings cannot be assured.

Submitted by:
/s/ [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR EQUAL SOVEREIGN STANDING* was delivered to the Montgomery County District Attorney's Office on this 8rd day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106595507
Filing Code Description: Motion
Filing Description: MOTION FOR EQUAL SOVEREIGN STANDING
Status as of 10/8/2025 5:00 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/8/2025 12:05:15 PM	SENT
[redacted]		[redacted]	10/8/2025 12:05:15 PM	SENT
Justin Pierce		mcsomedia@mctx.org	10/8/2025 12:05:15 PM	SENT

Received and E-Filed for Record
10/8/2025 2:52 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
32
Deputy Clerk, Katherine Burns

CAUSE NO. 232

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION FOR CLARIFICATION ON ATTORNEY APPOINTMENT AND CO-COUNSEL RIGHTS

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted]**, appearing pro se,** and moves the Court to address the attorney appointment and co-counsel rights issues in this case, and states:

I. INTRODUCTION SUMMARY

Defendant moves the Court to:

A. Confirm whether the Court appointed a new attorney as required by the May 8, 2020 withdrawal order of attorney David Bluestein;

B. Identify the name and contact information of any attorney currently appointed to represent Defendant;

C. Confirm whether Defendant was notified of any attorney withdrawal or new appointment at any time;

D. Confirm that Defendant's specific request for co-counsel representation was received, considered, and whether the Court acknowledges co-counsel with a non-bar member is prohibited;

E. Establish a clear and formal record of all communications, notifications, and attorney appointments or withdrawals since September 2019;

F. Order all relevant parties including the Court Clerk and District Attorney's Office to provide written and certified statements on the attorney appointment process and notification procedures in this cause;

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G. Require any necessary corrective action to protect Defendant's constitutional rights to counsel and due process, including appointment of effective counsel and assurance of Defendant's participation and communication with counsel.

II. FACTUAL BACKGROUND

A. On May 8, 2020, the Court signed an order permitting withdrawal of attorney David Bluestein as attorney of record in this case.

B. The order explicitly stated the Court would appoint a new attorney to represent Defendant.

C. Defendant has never received notification from the Court, District Attorney, or any other party regarding appointment of a new attorney.

D. Defendant was not informed that attorney Bluestein had withdrawn.

E. Defendant never had any communication or contact with attorney Ray and Bluestein or any replacement counsel.

F. On September 30, 2019, Defendant appeared before Judge Keith Stewart and requested removal of court-appointed attorney Darin John Ray for failure to provide representation or communication.

G. Defendant expressly requested co-counsel representation only, retaining full decision-making authority over the defense.

H. The Court did not inform Defendant that co-counsel arrangements with a non-bar member are not permitted under applicable law or court rules. As a direct result of this omission, Defendant spent approximately five (5) years contacting and attempting to retain hundreds of attorneys in pursuit of a co-counsel arrangement that was legally prohibited from the outset. This caused significant and unnecessary delay, hardship, and waste of time and resources. Defendant holds Judge Keith Stewart personally responsible and directly liable for failing to disclose this critical legal limitation while Defendant was present in open court and specifically requested co-counsel. The Court could have prevented years of wasted effort by simply stating at that time that the request was not legally permitted.

I. Defendant made extensive efforts over multiple years attempting to obtain co-counsel representation, fully unaware that such an arrangement was legally barred. Defendant's time, energy, and progress were significantly obstructed as a result of this lack of transparency from the Court.

J. The Court's failure to appoint counsel after the May 8, 2020 order allowing withdrawal of attorney David Bluestein—and failure to notify Defendant of that withdrawal or the Court's obligation to appoint new counsel—constitutes a violation of Defendant's constitutional rights to counsel and due process under both state and federal law. Defendant was never informed of the withdrawal, never received notice of any new

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appointment, and was entirely excluded from this critical development in the case, despite the Court's own order stating that counsel would be reassigned.

III. GROUNDS / AUTHORITY

A. The Sixth Amendment guarantees the right to the effective assistance of counsel, which includes meaningful participation in one's own defense—not the substitution of the defendant's judgment or loss of control over their case. Defendant expressly requested legal assistance in the form of co-counsel, not a complete takeover by a court-appointed attorney acting contrary to Defendant's expressed wishes. Denying Defendant the ability to participate meaningfully in their defense, while simultaneously barring the form of legal assistance requested, undermines the core protections of the Sixth Amendment. The Court failed to inform Defendant that co-counsel arrangements with a non-bar member are not legally permitted, resulting in Defendant's multi-year pursuit of an unavailable form of representation. This failure to disclose constitutes a deprivation of both due process and the right to effective assistance of counsel.

B. The Fourteenth Amendment guarantees due process, including timely notice and a meaningful opportunity to be heard.

C. The Texas Rules of Civil and Criminal Procedure require courts to timely appoint counsel and to notify parties of counsel appointment status.

D. Failure to appoint counsel as ordered, and failure to notify Defendant of counsel status, constitute violations of Defendant's rights to effective assistance of counsel and due process.

E. The Court possesses inherent authority to clarify attorney appointment status and to enforce Defendant's constitutional and statutory rights.

RELIEF REQUESTED

Defendant moves the Court to:

A. Confirm Attorney Appointment
Clarify and confirm whether any attorney was appointed following the Court's May 8, 2020 Order granting withdrawal of David Bluestein as counsel of record.

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B. Identify Attorney(s) and Compel Detailed Accounting of Legal Activity
Identify and notify Defendant in writing of the full legal name, bar number, contact information, and exact date of appointment of any attorney currently or previously assigned to represent Defendant in this case. Defendant further moves the Court to compel a detailed, itemized, and signed written statement from each such attorney (or the Clerk if the attorney is unavailable) disclosing all actions taken on Defendant's behalf since the date of appointment, including but not limited to:

1. Court appearances;
2. Filings submitted;
3. Legal advice given;
4. Communications with Defendant or the Court;
5. Any actions or omissions regarding the issuance, continuation, or resolution of any outstanding Failure to Appear warrant.

If no action was taken by the attorney, the Court shall require said attorney (or the Clerk if necessary) to issue a signed, dated, and notarized certification of non-action under penalty of perjury.

C. Confirm Notifications Provided to Defendant
Confirm whether Defendant was ever notified in writing of:

1. The withdrawal of attorney David Bluestein;
2. The appointment of any subsequent attorney;
3. The status of representation at any point since May 8, 2020.

D. Clarify Court's Position on Co-Counsel Requests
Acknowledge Defendant's explicit request for co-counsel representation made in open court on or about September 30, 2019, and clarify the Court's legal position on co-counsel arrangements with individuals who are not licensed bar members. Defendant further moves the Court to acknowledge and record the Court's failure to advise Defendant at the time that such arrangements are prohibited, resulting in substantial prejudice and wasted effort over several years.

E. Establish and Certify Attorney Representation History
Order the Clerk of Court to compile and certify a complete chronological record detailing all attorney appointments, withdrawals, notices, and communications made by the Court or its agents to Defendant regarding legal representation from August 2019 to present.

F. Issue Certified Written Statements from Court and Prosecution
Order the Court Clerk and the Montgomery County District Attorney's Office to each produce a signed, dated, and certified written statement outlining:

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1. Their respective procedures for appointing and notifying counsel;
2. The application of those procedures in Defendant's case;
3. Any record of actual notices sent or received by Defendant.

G. Immediate Appointment of Counsel, if None Exists
If the Court confirms that no attorney currently represents Defendant, immediately appoint qualified legal counsel and ensure Defendant is promptly informed in writing and given meaningful opportunity to communicate with said attorney.

H. Grant All Further Relief Justified by Law and Record
Order any and all further relief authorized by law and necessary to protect Defendant's constitutional rights to counsel, due process, and fair access to the judicial process.

V. VERIFIED STATEMENT

Defendant declares that the facts stated herein are true and correct to the best of Defendant's knowledge.

Submitted by:
/s/ [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR CLARIFICATION ON ATTORNEY APPOINTMENT AND CO-COUNSEL RIGHTS* was delivered to the Montgomery County District Attorney's Office on this 8rd day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106609430
Filing Code Description: Motion
Filing Description: Motion for Clarification on Attorney Appointment & Co-Counsel Rights
Status as of 10/9/2025 8:09 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/8/2025 2:52:13 PM	SENT
[redacted]		[redacted]	10/8/2025 2:52:13 PM	SENT

Received and E-Filed for Record
10/8/2025 2:58 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
[illegible]2
Deputy Clerk, Katherine Burns

CAUSE NO. [illegible]32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO COMPEL ACKNOWLEDGMENT AND FOR JUDICIAL NOTICE

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and moves the Court to acknowledge and act on documents hand-delivered on September 30, 2019, and any subsequent unaddressed filings, and states:

I. INTRODUCTION / SUMMARY

Defendant moves the Court, Clerk, and Montgomery County District Attorney's Office to:

- Confirm and enter on the official record all documents hand-delivered by Defendant on September 30, 2019, and any other filings by Defendant that remain unaddressed;
- Take judicial notice of the existence, filing stamps, and contents of those documents;
- Provide Defendant with certified, signed, notarized hard copies of all such filings and orders, mailed via certified return receipt requested, and send complete digital copies via email in PDF format;
- File a written response within fourteen (14) calendar days explaining the status of these filings.

Defendant does not consent to in-person appearances or hearings unless expressly ordered by the Court in writing. All communications regarding this matter shall be conducted in writing.

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II. FACTUAL BACKGROUND

On September 30, 2019, Defendant appeared in Montgomery County Court at Law #5 and personally hand-delivered multiple sworn filings, which were accepted and stamped by the Clerk, appearing in the official court docket.

The State, represented by the District Attorney's Office, was physically present during this session and had actual notice of the filings. Although no certificate of service was included, presence of the State and the Court in open session constitutes effective notice.

Despite over six (6) years passing, Defendant has received no written ruling, objection, rejection, or other response from the Court or prosecution regarding these filings.

Efforts to obtain the transcript of the September 30, 2019 proceeding have been unsuccessful without payment of fees. Defendant refuses to pay fees to obtain the transcript and moves the Court to either file the transcript into the record or issue a certification of its existence and content, including Defendant's presence at the proceeding.

Defendant continues to suffer substantial prejudice, including the inability to work due to a failure to appear warrant issued against Defendant despite Defendant's documented presence on September 30, 2019.

III. GROUNDS / AUTHORITY

Due process under the United States Constitution Amendments V and XIV, and Texas Constitution Article I, requires the Court to provide notice and an opportunity to be heard when filings may affect a party's rights.

Failure of the State or the Court to respond to these filings for over six years constitutes waiver and forfeiture of any objections to the filings.

Equity and principles of laches prohibit prolonged, unexplained silence and inaction that cause prejudice to Defendant.

The Court has the authority under Texas Rule of Evidence 201 and its inherent docket management powers to take judicial notice of its own records, including filings and transcript status.

Defendant moves the Court to facilitate access to the September 30, 2019 transcript through in forma pauperis relief if necessary, so fees do not block access to the record.

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IV. RELIEF REQUESTED

Defendant moves the Court to:

A. Confirm and enter on the official record all documents Defendant hand-delivered on September 30, 2019, and any subsequent unaddressed filings, including indexing or docket listing of these filings.

B. Take judicial notice of the existence and filing of these documents in the official court file.

C. Order the Montgomery County District Attorney's Office and Court Clerk to file a written response within fourteen (14) calendar days specifying whether they:

i. Object to the filings, stating grounds;

ii. Rebut or contest the filings, stating grounds; or

iii. Waive objections and accept the filings as part of the record.

D. Order the Clerk and/or Court Reporter to:

i. File the full transcript of the September 30, 2019 proceeding into the official court record immediately; and

ii. Issue a signed, dated, and notarized certification confirming the transcript's existence and whether it reflects Defendant's presence at the proceeding.

Certified and notarized copies of the transcript and certification must be mailed to Defendant by certified return receipt requested and emailed in PDF format.

No fees shall be imposed on Defendant for access to the transcript or its filing. The State and Court shall bear all costs or provide in forma pauperis relief.

E. Recall or quash any outstanding warrant(s) for failure to appear or related offenses issued solely because of events on September 30, 2019. If immediate recall or quashing is not granted, order a show-cause hearing scheduled without delay to address the warrant.

F. Require all communications, proceedings, and responses related to this motion and the September 30, 2019 filings be conducted exclusively in writing by formal filings and service. Defendant does not consent to or is unable to attend any in-person hearings or appearances unless expressly ordered by the Court.

G. Grant any further relief authorized by law or necessary to enforce Defendant's rights.

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V. VERIFIED STATEMENT

Defendant declares under penalty of perjury under the laws of the United States and Texas that the facts stated herein are true and correct to the best of Defendant's knowledge and belief.

Submitted by:
/s/ [redacted]

INTENTIONALLY

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO COMPEL ACKNOWLEDGMENT AND FOR JUDICIAL NOTICE* was delivered to the Montgomery County District Attorney's Office on this 8rd day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Envelope ID: 106610019
Filing Code Description: Motion
Filing Description: Motion to Compel Acknowledgment & for Judicial Notice
Status as of 10/9/2025 8:10 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/8/2025 2:58:17 PM	SENT
[redacted]		[redacted]	10/8/2025 2:58:17 PM	SENT

Received and E-Filed for Record
10/9/2025 12:16 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
Deputy Clerk, Katherine Burns

CAUSE NO :32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO COMPEL RESPONSES TO INTERROGATORIES

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted]**, appearing pro se,** and **moves the Court for an Order to Compel Responses to Interrogatories**, and in support thereof states the following:

I. INTRODUCTION

Defendant moves the Court to issue an order compelling responses to interrogatories necessary for the preparation of his defense. For over six years, Defendant has made repeated, direct, and documented efforts to obtain basic information related to the underlying charges, including the identities, roles, and statements of key individuals involved in the arrest and prosecution. These efforts have been willfully ignored or obstructed by multiple government entities. The Defendant is not seeking discovery as a matter of convenience, but as a matter of necessity to defend against a prosecution that has caused substantial personal, legal, and financial harm due to false claims and procedural misconduct. The refusal of the State and its agents to provide this information violates the Defendant's constitutional right to prepare a defense and demands Court intervention.

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II. FACTUAL BACKGROUND

1. Obstruction by Sheriff's Office

a. You made repeated, good-faith attempts to obtain information about your case, including contacting the Montgomery County Sheriff's Office.
b. Instead of providing assistance, you were hung up on repeatedly, which can be seen as intentional obstruction or failure to cooperate in good faith.
c. One specific instance of you being told by Lieutenant Fitzgerald that you would be arrested for harassment simply for continuing to try to gather information would be a violation of your rights to prepare a defense.

2. False Claims and Threats by Law Enforcement

a. The alleged lie about you threatening people—especially when Sergeant Alvarez claimed you were threatening to kill people simply for asking questions—should be highlighted as an example of defamation or fabrication of facts to intimidate you into silence.
b. This false claim by law enforcement led to SWAT team deployment and shows an abuse of power and a pattern of bad faith on the part of the prosecution and law enforcement.

3. Failure of the State to Provide Information

a. Despite six years of attempts and evidence of repeated efforts (calls, emails, etc.), the state has failed to provide even basic information regarding your case, witnesses, evidence, or the actions of law enforcement.
b. Your constitutional rights to a fair defense have been violated through deliberate obstruction and stonewalling.

4. Consequences of Withholding Information

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a. The ongoing lack of cooperation by law enforcement and the prosecution has left you in a position of disadvantage, unable to properly prepare your defense and suffering consequences (loss of employment, restriction of rights, etc.) due to the false warrant.
b. These actions by law enforcement and the prosecution are not only unprofessional but also illegal, and the Court needs to intervene.

5. Violation of Constitutional Rights

a. The deliberate failure to provide information is obstructing your right to prepare a defense, a core constitutional principle under the Sixth Amendment (right to a fair trial).

6. Harassment and Retaliation

a. The threat of arrest for harassment when you were merely trying to defend yourself and the false claims of threats made by law enforcement may constitute harassment and retaliation by officials to intimidate you and silence your efforts.

7. Breach of Duty

a. Law enforcement and the prosecution have a legal obligation to cooperate and provide discovery. Their repeated failures are a clear breach of that duty, and the Court should intervene.

III. RELIEF REQUESTED

Defendant asks the Court to grant this Motion and issue an Order compelling the named individuals and entities to respond in writing and under oath to Defendant’s interrogatories within eight (8) days of proper service, and to impose appropriate sanctions for any failure to comply.

IV. LEGAL BASIS

The Sixth Amendment to the United States Constitution guarantees the Defendant the right to present a complete defense, including the ability to confront accusers and gather evidence. Additionally, under **Texas**

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Code of Criminal Procedure Art. 39.14, the State has a duty to disclose evidence relevant to the defense. Where the State and its agents refuse to cooperate or provide information necessary to that defense, the Court has the authority to compel disclosure and grant appropriate remedies to ensure due process.

V. VERIFIED STATEMENT

Defendant declares that the facts stated herein are true and correct to the best of Defendant's knowledge.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO COMPEL RESPONSES TO INTERROGATORIES* was delivered to the Montgomery County District Attorney's Office on this 8rd day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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CAUSE NO. :32

COUNTY COURT AT LAW NO. 5
COUNTY OF MONTGOMERY, STATE OF TEXAS

ORDER TO COMPEL RESPONSES TO INTERROGATORIES

On this day the Court considered Defendant's Motion to Compel Responses to Interrogatories. The Court finds good cause exists to grant the motion.

It is therefore **ORDERED** that the following individuals/entities: _____, shall each respond in writing and under oath to the Defendant's interrogatories, as attached and/or served separately, within eight (8) days after being properly served with this Order and the interrogatories by personal delivery, certified mail, or other court-approved method. All responses must be complete, truthful, and verified under penalty of perjury. Any objections must be made in writing to this Court within the same deadline and must state specific grounds for each objection.

If any person or entity fails to fully comply with this Order, the Court shall consider motions to enforce compliance and is authorized to impose sanctions, including but not limited to: an order compelling compliance; an award of reasonable costs and expenses directly to the Defendant, including service fees, copying costs, and other out-of-pocket expenses; fines payable to the Defendant as compensatory sanctions for any delay; and contempt of court proceedings. All monetary sanctions, fees, and reimbursements awarded under this Order shall be paid directly to the Defendant and not to the State.

IT IS FURTHER ORDERED that the Defendant may serve this Court-signed Order, the interrogatories, and any required verification or affidavit on each named recipient by personal service, certified mail (return receipt requested), or other method authorized by the Court, and that Defendant shall file proof of service with the Court.

Signed this the _____ day of _____, 2025.

_____

JUDGE PRESIDING
County Court at Law No. 5
County of Montgomery, State of Texas

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Envelope ID: 106650937
Filing Code Description: Motion
Filing Description: Motion to Compel Responses to Interrogatories
Status as of 10/9/2025 12:37 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/9/2025 12:16:05 PM	SENT
[redacted]		[redacted]	10/9/2025 12:16:05 PM	SENT
Justin Pierce		mcsomedia@mctx.org	10/9/2025 12:16:05 PM	SENT

Received and E-Filed for Record
10/9/2025 4:03 PM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
:32
Deputy Clerk, Katherine Burns

CAUSE NO. 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO VALIDATE CHARGING INSTRUMENT

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted]**, appearing pro se,** and **moves the Court** to validate the charging instrument in this matter. This motion is filed to address concerns regarding the administration of the oath on the charging instrument and to ensure that the Defendant's constitutional right to a fair, impartial, and transparent legal process is upheld.

I. NOTICE OF CLARIFICATION OF TERMS AND ENTITIES INVOLVED

For the record and for all future references in this case:

1. **The State of Texas** is recognized in this proceeding as a legal fiction — a governmental entity seeking charges against a natural person. It has no physical presence and operates solely through designated financially compensated agents.
2. **The District Attorney's Office of Montgomery County** is likewise a legal fiction entity created by the State of Texas to carry out criminal prosecution. It does not act independently of the State but rather as its prosecutorial arm.
3. **All individuals employed by or acting on behalf of the District Attorney's Office** — including Assistant District Attorneys — will be referred to throughout these filings as **prosecutors**, regardless of whether they are assigned to prosecute the specific case at hand. These individuals, by virtue of

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their employment and duties, are inherently aligned with the interests of the prosecuting party and are therefore not neutral participants in the judicial process.

4. This clarification is intended to avoid semantic confusion or mischaracterization of roles and responsibilities and to ensure that the record reflects the true nature of each party's involvement.

Accordingly, references to 'prosecutor' in this filing should be understood to encompass any and all individuals operating under the authority or in service of the Montgomery County District Attorney's Office.

1. U.S. CONSTITUTION – DUE PROCESS CLAUSES (14TH & 5TH AMEND)

The **14th Amendment** of the U.S. Constitution provides for **due process** under the law, meaning the government must not deprive anyone of life, liberty, or property without due process. Additionally, the **5th Amendment** guarantees that no person shall be deprived of due process of law by the federal government.

Due process requires that government actors, including prosecutors, maintain **impartiality** and avoid **conflicts of interest**.

a. Due Process and Fair Trial: The **due process** protections require impartiality, not just in the trial itself, but in all steps leading up to it. If the state (or prosecutor) is actively involved in a case, it undermines **impartiality** if they are allowed to administer an oath for a charging instrument (a process that is supposed to be neutral). The role of the prosecutor should be to advocate for the law, not to be the one swearing to the validity of the charges.

Relevant Case Law:

b. Brady v. Maryland, 373 U.S. 83 (1963): The U.S. Supreme Court held that the prosecution must not conceal exculpatory evidence and must act in a manner that ensures a **fair trial**. A process that permits a prosecutor to administer the oath for the charging instrument undermines the fundamental fairness of the process.

c. In re Murchison, 349 U.S. 133 (1955): The U.S. Supreme Court held that due process requires an impartial tribunal. A prosecutor administering an oath for a charging instrument could be seen as acting in a manner that **compromises impartiality** because they are also a key player in the case's outcome.

d. Caperton v. A.T. Massey Coal Co., Inc., 556 U.S. 868 (2009): The Court ruled that due process is violated when there is a **perceived bias** by a judge or decision-maker. Although this case involved a judge, the underlying principle can apply to any public official, including prosecutors, who have a vested interest in the outcome of a case.

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2. CONFLICT OF INTEREST AND JUDICIAL IMPARTIALITY PRINCIPLES

While Article 15.04 and Article 15.05 do not specifically prohibit an Assistant District Attorney from administering an oath, there are **broader legal principles** that emphasize **impartiality** in legal proceedings, especially when a party has a direct stake in the outcome.

Relevant Legal Principle: Conflict of Interest

a. Conflict of Interest: When the prosecutor, who is advocating for the state, is also involved in administering the oath, there is a **potential conflict of interest**. The prosecutor's role is to argue for a conviction, not to verify the **validity** of the charges at the outset. The public's right to a fair process is **undermined** if one party to the case holds such a significant role in the preliminary steps of the case.

Relevant Case Law:

b. Marshall v. Jerrico, Inc., 446 U.S. 238 (1980): The Court stated that the **appearance of bias** is enough to violate due process principles, not just actual bias. A situation in which a prosecutor administers the oath to a complaint would likely be viewed as a conflict of interest and, therefore, a violation of the defendant’s right to an impartial process.

c. Caperton v. A.T. Massey Coal Co., Inc., 556 U.S. 868 (2009): The case reinforces that when a person with a financial interest in the outcome of the case is allowed to influence the proceedings, even **unintentional bias** can violate due process.

3. TEXAS CONSTITUTION – ARTICLE I, SECTION 13

The Texas Constitution provides similar due process protections. Specifically, **Article I, Section 13** guarantees **due process** and **equal protection under the law**.

Relevant Texas Law:

a. Texas Constitution, Article I, Section 13: This provision guarantees that **no person shall be deprived of life, liberty, property, privileges, or immunities without due course of law**. Ensuring that the charging instrument is **fair** and **unbiased** is essential for maintaining these protections.

4. TEXAS RULES OF PROFESSIONAL CONDUCT

These rules are primarily aimed at attorneys, including prosecutors, to ensure that their conduct remains ethical and unbiased in all legal matters. A prosecutor has a duty to uphold fairness in the legal process.

Relevant Rules:

a. Texas Disciplinary Rules of Professional Conduct, Rule 3.08 (Conflict of Interest - Prosecution): This rule mandates that prosecutors must act **ethically and impartially**, ensuring that

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their actions are not clouded by any conflicts of interest or bias. A prosecutor who administers the oath for a criminal complaint may be violating these ethical guidelines, especially if it creates a perception of unfairness or bias.

Summary of Key Points:

1. **Due process and impartiality**: The 5th and 14th Amendments guarantee that criminal defendants receive a fair trial, which includes an impartial process from the beginning.
2. **Conflict of Interest**: Having the prosecutor administer the oath raises questions about bias and the fairness of the process.
3. **The Texas Constitution**: Guarantees due process, and the use of a prosecutor to administer an oath undermines fairness.
4. **Ethical Standards**: The Texas Disciplinary Rules of Professional Conduct hold prosecutors to high ethical standards, including avoiding conflicts of interest.
5. **Closing the Gap**: You can request the court clarify this issue, propose changes in procedure, and challenge the legitimacy of the charging instrument.

II. QUESTIONS FOR THE JUDGE

1. IMPARTIALITY AND CONFLICT OF INTEREST:

Judge, how can the principles of due process and fairness be upheld when the prosecutor—here, an Assistant District Attorney—administers the oath on a charging instrument in a case they are prosecuting? Doesn't this constitute a fundamental conflict of interest that undermines judicial impartiality?

2. LEGAL INTEGRITY OF THE CHARGING INSTRUMENT:

Considering the prosecutor both prepared and swore to the charging instrument, can it truly satisfy the neutrality and impartiality essential for valid criminal charges? Does this practice conform with Texas law and fundamental legal standards, or does it erode the integrity of the process?

3. IMPACT ON THE DEFENDANT'S RIGHTS:

How does the court ensure the defendant's constitutional right to a fair and impartial process is protected when the oath for the complaint is administered by an interested party—specifically, the prosecuting Assistant District Attorney? Doesn't this inherently compromise fairness?

4. TRANSPARENCY AND ACCOUNTABILITY:

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Why was no neutral third party involved in administering the oath for this complaint, especially given the defendant was in custody and accessible to a magistrate or judge? Why was the oath not administered in the defendant's presence? Furthermore, why are the signatures illegible and why was the Assistant District Attorney's full printed name omitted when it could easily have been provided? What measures exist to guarantee transparency and accountability in this critical procedural step?

5. COMMON SENSE AND REASONABLENESS:

Isn't it common sense that a prosecutor, as a direct participant in the prosecution, should not be permitted to administer the oath for the charging instrument in their own case? Doesn't this practice create at least an appearance of impropriety, if not a clear conflict of interest

6. CLARIFICATION ON THE LAW:

Can you clarify whether Texas law specifically allows for an Assistant District Attorney to administer the oath for a charging instrument in the manner we see here, or is this a procedural gap or oversight in the law that is being exploited for practical convenience?

7. THE ROLE OF THE COURT IN ENSURING FAIRNESS:

Judge, what role does the court play in ensuring that the charging instrument filed before it is free from any potential bias, conflict, or procedural error? How can the court maintain impartiality when the very instrument that initiates the legal process is compromised by internal interests?

8. POSITIVE VS. NEGATIVE LAW:

Considering both the positive law (the written statutes) and the negative law (the principle that no one should act beyond the power conferred by law), is there an argument that this practice violates basic principles of fairness and logic, even if it is not explicitly prohibited under Texas law? How does the court view the potential dangers of allowing this practice to continue unchallenged?

IN CLOSING:

Given the points I have raised, Judge, I respectfully request that the court provide clarity regarding the legality, fairness, and reasoning behind the procedures used in the initiation of this case — particularly as they relate to the Defendant's constitutional right to a fair trial and an impartial legal process.

If the court finds any merit in these concerns, I ask that appropriate corrective actions be considered, including but not limited to a formal review of the charging instrument's validity and the procedures used in its creation.

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III. REQUEST FOR DISCOVERY REGARDING OATH ADMINISTRATION PROCEDURES

I am requesting full and complete discovery of any and all policies, procedures, rules, manuals, training materials, or written internal guidelines used by the District Attorney's Office, law enforcement, magistrates, or any other relevant agencies in Montgomery County, Texas, that govern the administration of oaths for criminal complaints or affidavits used to initiate criminal prosecution.

This includes:

a. Identification of who is authorized to administer oaths in this jurisdiction for the purpose of initiating criminal charges;

b. Any policies or memoranda that address or permit the use of assistant district attorneys or prosecutors in the administration of such oaths;

c. Any training or procedural documentation given to assistant district attorneys regarding their role in criminal complaint preparation or affidavit administration;

d. The specific protocol followed in my case with respect to the administration of the oath, including the full name and role of the individual who administered the oath;

e. Documentation or justification as to why the oath was administered without the defendant present, despite the defendant being in custody and accessible to either a judge or neutral notary.

The purpose of this request is to determine whether the procedures followed in this case were consistent with constitutional due process, impartial standards, and conflict-of-interest rules. If these procedures deviate from what would be considered fair, neutral, and impartial — or if there is no documented procedure at all — that directly impacts the legitimacy of the charging instrument and the integrity of the proceedings.

This is not a speculative concern — this is a foundational matter of proper legal process, transparency, and the right to be informed about how one's prosecution is initiated. The State has an obligation to disclose how its internal procedures operate when those procedures have a direct bearing on the validity of the criminal complaint and the initiation of charges against a citizen.

IV. ETHICAL CHALLENGE TO PROSECUTOR ADMINISTERING OATH

I raise a direct and serious challenge to the practice of allowing a prosecutor — particularly an Assistant District Attorney from the same office pursuing the case — to act as the official administering the oath on a charging instrument like the criminal complaint affidavit.

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This practice presents an undeniable conflict of interest and violates the core principles of due process and prosecutorial ethics. The Assistant District Attorney is a party to the case, with an obvious interest in securing a prosecution. When that same individual, or a colleague from the same prosecutorial office, administers the oath that validates the complaint — the very document that initiates criminal charges — it corrupts the appearance of neutrality required at the outset of a criminal case.

Prosecutors are bound not only by the Texas Code of Criminal Procedure but also by the Texas Disciplinary Rules of Professional Conduct and the United States Constitution's guarantee of due process. Their duty is not merely to convict, but to ensure that justice is done — which includes upholding fairness and objectivity in all pretrial procedures. Acting as both advocate and gatekeeper to the judicial process (via administering the oath) violates this role.

Additionally, the use of a prosecutor to swear in a criminal complaint — without the presence or awareness of the accused — while the accused was being held in custody and fully accessible to a judge, magistrate, or neutral notary, demonstrates a deliberate choice to bypass the very safeguards designed to ensure impartiality at the outset of prosecution. Given that the State had full logistical and procedural access to qualified, neutral officials, including judges, magistrates, and jail-based notaries, there was no legitimate justification for circumventing those neutral actors in favor of a party directly aligned with the prosecution.

This is not a minor procedural issue. It speaks to institutional bias, and it undermines the integrity of the entire case. The legitimacy of the charging instrument is questionable when the oath that gives it legal force is administered by someone directly connected to the prosecuting authority.

For a prosecution to be fair, its foundations must be free from even the appearance of impropriety or conflict. Here, that standard has not been met, and I intend to challenge this practice until it is addressed by the court.

V. REQUEST TO MOVE TO THE COURT

1. The Defendant respectfully requests the Court clarify the legal authority of an Assistant District Attorney to administer the oath for a charging instrument and whether such authority aligns with the fundamental principles of impartiality and due process.

2. The Defendant requests that the Court order all charging instrument oaths to be administered by neutral third parties who have no vested interest in the case, such as judges, notaries public, or other impartial officials.

3. The Defendant requests the Court revise its internal procedures to ensure that all criminal charges are sworn under oath by neutral officials, particularly in cases where the prosecutor is actively involved, in order to eliminate conflicts of interest and preserve the fairness of the process.

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4. In the event the Court does not provide satisfactory clarification or remedy, the Defendant requests the Court dismiss or otherwise challenge the legitimacy of the charging instrument on the grounds that due process was violated by the conflict of interest inherent in the oath administration process.

5. The Defendant requests discovery of any and all internal policies, procedures, rules, training materials, or written guidelines used by the District Attorney's Office, law enforcement agencies, magistrates, or other relevant authorities in Montgomery County, Texas, that govern the administration of oaths for criminal complaints or affidavits initiating criminal prosecution.

VI. VERIFIED STATEMENT

Defendant declares that the facts stated herein are true and correct to the best of Defendant's knowledge.

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO VALIDATE CHARGING INSTRUMENT* was delivered to the Montgomery County District Attorney's Office on this 9th day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Filing Code Description: Motion
Filing Description: Motion to Validate Charging Instrument
Status as of 10/10/2025 8:19 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Ligon	796955	daefile@mctx.org	10/9/2025 4:03:18 PM	SENT
[redacted]		[redacted]	10/9/2025 4:03:18 PM	SENT

Received and E-Filed for Record
10/10/2025 11:08 AM
L. Brandon Steinmann, County Clerk
Montgomery County, Texas
:32
Deputy Clerk, Katherine Burns

CAUSE NO. :32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO CHALLENGE INTEGRITY & CREDIBILITY OF MONTGOMERY COUNTY SHERIFF'S OFFICE

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and moves the Court to file this Motion to Challenge the Integrity and Credibility of the Montgomery County Sheriff's Office. This motion is made pursuant to the Defendant's fundamental right to due process, equal protection, and a fair and impartial judicial process. It is based on substantial and well-documented acts committed by Montgomery County law enforcement that amount to defamation, specifically libel, false official recordkeeping, character assassination, and potential official misconduct by a public agency.

The Defendant has recently obtained official records through lawful Open Records Requests, which include repeated written references by the Montgomery County Sheriff's Office describing the Defendant as "1096 delusional," "anti-law enforcement," "belligerent," and, most disturbingly, as someone who "pointed gun [or guns] at officers." These statements are presented as if factual, yet the Defendant has never engaged in such conduct, has never been questioned, arrested, charged, or prosecuted for any such act, and has no knowledge of any such incident ever occurring.

The facts — and common sense — speak for themselves: if the Defendant had truly pointed a firearm at law enforcement officers, such an event would almost certainly have resulted in felony charges, immediate

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arrest, or the use of deadly force. The absence of any such response from law enforcement over the nearly ten years these claims have existed in the Sheriff's files strongly indicates that these statements are false, defamatory, and recklessly recorded in official documentation. The mere presence of these unsubstantiated and damaging claims — especially when accessible through public records — constitutes not only libel but also official misconduct and a clear violation of the Defendant's right to a fair process.

Defendant now moves this Court to formally recognize these facts and the implications they carry for the credibility of the Montgomery County Sheriff's Office and to grant the relief requested herein.

I. FACTUAL BACKGROUND

1. Defendant has, over a period of approximately ten (10) years, made numerous formal and informal attempts—via phone, email, in-person visits, and written correspondence—to obtain clarification regarding false and defamatory information contained within MCSO documents and open-records disclosures.
2. Specifically, MCSO has, without substantiation or supporting evidence, repeatedly circulated documentation—*a sample of which is attached below as Exhibit A*—bearing a header that reads as follows (emphasis added):

   > **"Directions: name, age, anti-law enforcement, 10-96 delusional, confrontational, belligerent, gun pointed at officers. 12.22.16 called MCSO requesting no contact with law enforcement unless he calls us requesting it. Advises he is a private citizen and operates under common law."**

3. This text appears atop publicly released open-records materials—not merely internal use records—thereby placing a false, stigmatizing, and defamatory description of Defendant into the public domain, where it is accessible to employers, agencies, courts, and private citizens conducting routine background checks or information searches.
4. Defendant has never pointed a firearm at any law-enforcement officer, nor has he been charged, arrested, or convicted of any such offense. If such an act had occurred, it would constitute a serious felony, and the absence of any corresponding arrest or prosecution is itself dispositive proof that the statement is false. Indeed, common sense and established law enforcement practice dictate that any individual who pointed a gun at an officer would almost certainly be arrested immediately or, in some cases, lawfully shot in self-defense. The fact that the Defendant was neither arrested nor charged supports the clear conclusion that these statements are false and fabricated

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5. Defendant has repeatedly requested an opportunity to address and correct this information directly with the Sheriff—first under Sheriff Rand Henderson and more recently under Sheriff Wesley Doolittle—but all requests have been ignored, dismissed, or refused by MCSO personnel.

II. LEGAL AND ETHICAL IMPLICATIONS

6. The inclusion of the phrase '10-96 delusional' and the unsubstantiated allegation that the Defendant pointed a gun at officers constitutes defamation per se. These statements not only falsely impute serious criminal conduct but also falsely suggest mental illness, without any medical or legal basis. Because these defamatory remarks are recorded in official MCSO documents, publicly released via Open Records requests, this conduct also amounts to libel and false official recordkeeping. Furthermore, these actions constitute character assassination by a public agency, undermining the Defendant's reputation and exposing systemic misconduct within the MCSO.
7. Because these materials are released under the Texas Public Information Act (TPIA) to members of the public, the defamatory language cannot be characterized as "internal communication." It constitutes public dissemination of false and damaging information, actionable under both Texas defamation law and civil-rights protections (42 U.S.C. § 1983).

   Such dissemination of false and damaging information by a public agency goes beyond mere internal miscommunication; it represents a gross violation of ethical standards and legal duties to maintain accurate and truthful official records.
8. Furthermore, the creation and circulation of these false narratives amount to character assassination and institutional bias, calling into question the integrity of every sworn statement, affidavit, or report originating from MCSO. The continued inclusion of this language in MCSO's publicly accessible records has serious and ongoing real-world consequences for Defendant. False accusations of mental instability and violent conduct toward law enforcement can lead to denial of employment opportunities, restrictions on international travel, loss of reputation, and escalated use-of-force responses by officers during future encounters. These risks are not speculative but inherent in the stigmatizing nature of the language MCSO has chosen to include and publicly disseminate. Moreover, it is entirely possible — and even likely — that Defendant has **already suffered reputational or legal consequences** stemming from this false information, including lost opportunities or biased treatment by individuals or institutions relying on these records without his knowledge.
9. The repeated refusal of MCSO to meet, explain, or correct this record—despite Defendant's documented efforts over many years—demonstrates deliberate indifference and supports a finding that the agency is operating in bad faith.

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III. RELEVANCE TO CURRENT PROCEEDINGS

10. MCSO's credibility is central to any matter in which its deputies, investigators, or affiliated personnel provide evidence, reports, or sworn complaints.

11. Given that the same agency participates directly in the arrest, complaint, and evidence process in this case, the demonstrated pattern of dishonesty, falsification, and defamation constitutes grounds for judicial scrutiny of all MCSO-originated materials.

    This pattern of dishonesty and bad faith conduct by the MCSO, evidenced by refusal to correct false records despite repeated requests, taints all evidence and statements originating from this agency. The Court should therefore treat any MCSO-derived evidence with heightened scrutiny

12. Under Brady v. Maryland, 373 U.S. 83 (1963), and Giglio v. United States, 405 U.S. 150 (1972), evidence affecting the credibility of law-enforcement officers is exculpatory in nature and must be disclosed. Defendant therefore moves that all MCSO personnel records, complaint files, and internal communications related to these false statements be produced for review.

IV. REQUESTS TO THE COURT

Defendant moves the Court to:

1. Take judicial notice of the false and defamatory language contained within MCSO's own public records;
2. Order discovery of all internal records, reports, communications, or directives concerning Defendant and the "10-96 delusional / gun pointed at officers" statement;
3. Compel MCSO to produce the names, ranks, and identification numbers of all individuals responsible for creating, maintaining, or authorizing the use of this false narrative;
4. Require MCSO to issue a formal public correction or retraction of the false statements in Defendant's official records.
5. Prohibit or suppress the use of any MCSO documents, affidavits, or testimony in the present proceedings unless independently verified for accuracy and impartiality; and
6. Formally recognize the demonstrated pattern of defamation, bias, and bad faith as grounds for diminished credibility of the MCSO as a law-enforcement source in this case.

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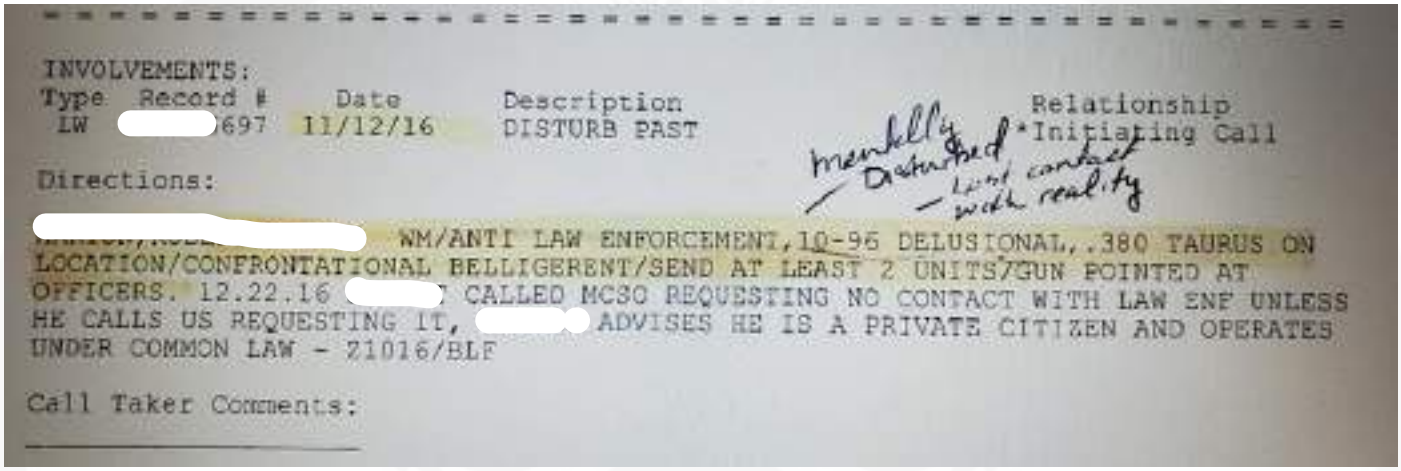
V. ATTACHED EXHIBIT

Defendant attaches as ***Exhibit A,*** a true and correct photocopy of the MCSO document header containing the false and defamatory statements at issue, obtained through a formal Open Records Request.



INVOLVEMENTS:
Type Record # Date Description Relationship
LW [redacted]697 11/12/16 DISTURB PAST *Initiating Call

mentally Disturbed — Lost contact with reality

Directions:

[redacted] WM/ANTI LAW ENFORCEMENT,10-96 DELUSIONAL,.380 TAURUS ON LOCATION/CONFRONTATIONAL BELLIGERENT/SEND AT LEAST 2 UNITS/GUN POINTED AT OFFICERS. 12.22.16 [redacted] CALLED MCSO REQUESTING NO CONTACT WITH LAW ENF UNLESS HE CALLS US REQUESTING IT, [redacted] ADVISES HE IS A PRIVATE CITIZEN AND OPERATES UNDER COMMON LAW - 21016/BLF

Call Taker Comments:

VI. CONCLUSION

This motion is grounded not in speculation, but in the MCSO's own written words and repeated refusal to engage in transparency or accountability, revealing institutional misconduct that jeopardizes public trust and due process. The record demonstrates an institutional willingness to circulate false and stigmatizing information about a private citizen without evidence or accountability. Such conduct not only undermines the Sheriff's Office's credibility, but strikes at the foundation of due process, fairness, and public trust.

Accordingly, Defendant requests that the Court grant this motion and issue such further orders as justice may require.

VII. VERIFIED STATEMENT

Defendant declares that the facts stated herein are true and correct to the best of Defendant's knowledge.

Submitted by:

/s/ [redacted]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO CHALLENGE INTEGRITY & CREDIBILITY OF MONTGOMERY COUNTY SHERIFF'S OFFICE* was delivered to the Montgomery County District Attorney's Office on this 10th day of October, 2025, by eFileTexas.org.

Signature: /s/ [redacted]

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Case Contacts

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Brett Ligon	796955	daefile@mctx.org	10/10/2025 11:08:38 AM	SENT
[redacted]		[redacted]	10/10/2025 11:08:38 AM	SENT